

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE LITIGATION

MDL No. 1456

THIS DOCUMENT RELATES TO:

ALL ACTIONS

CIVIL ACTION: 01-CV-12257-PBS

Judge Patti B. Saris

TRACK 1 DEFENDANTS' OBJECTIONS TO PLAINTIFFS' PROPOSED EXHIBITS

In addition to the objections enumerated below, each defendant objects to all documents produced by its co-defendants. Specifically, Defendant AstraZeneca Pharmaceuticals LP ("AstraZeneca") objects to the following exhibits on the grounds that (1) they were produced by co-defendants and are therefore irrelevant and inadmissible under Fed. R. Evid. 402 and (2) they constitute hearsay and are therefore inadmissible under Fed. R. Evid. 801: 176-373, 375-848, 921-932, 935-937, 939-940, 944-947, 951-952, 976-982. Defendant Johnson & Johnson ("J&J") objects to the following exhibits on the grounds that (1) they were produced by co-defendants and are therefore irrelevant and inadmissible under Fed. R. Evid. 402 and (2) they constitute hearsay and are therefore inadmissible under Fed. R. Evid. 801: 1-234, 375-816, 843-848, 913-919, 935-940, 944-947, 951-952, 980, 982A-Y. Defendant Bristol Meyers Squibb Co. ("BMS") objects to the following exhibits on the grounds that (1) they were produced by co-defendants and are therefore irrelevant and inadmissible under Fed. R. Evid. 402 and (2) they constitute hearsay and are therefore inadmissible under Fed. R. Evid. 801: 1-175, 235-373, 375-842, 913-919, 921-932, 938-939, 976-982, 982A-Y. Defendants Schering-Plough Corporation and Warrick Pharmaceuticals Corporation ("SP/W") object to the following exhibits on the grounds

that (1) they were produced by co-defendants and are therefore irrelevant and inadmissible under Fed. R. Evid. 402 and (2) they constitute hearsay and are therefore inadmissible under Fed. R. Evid. 801: 1-373, 817-848, 913-919, 921-932, 935-938, 940, 944-947, 951-952, 976-979, 981-982, 982A-Y.

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
1		6/20/03	Memorandum of Plea Agreement in <i>United States v. AstraZeneca Pharmaceuticals, LP</i> , Criminal Action No. 03-55 (D. Del.)	Relevance FRE 403	AstraZeneca
2			Information filed by the U.S. Attorney in <i>United States v. AstraZeneca Pharmaceuticals, LP</i> , Criminal Action No. 03-55 (D. Del.)	Relevance FRE 403	AstraZeneca
3		6/20/03	Transcript of the Plea and Sentencing Hearing before Honorable Joseph J. Farnan in <i>United States v. AstraZeneca Pharmaceuticals, LP</i> , Criminal Action No. 03-55 (D. Del.)	Relevance FRE 403	AstraZeneca
4	BERKMAN 0204-05	5/19/03	Information filed by the U.S. Attorney in <i>United States v. Robert A. Berkman, M.D.</i> , Criminal Action No. 03-45 (D. Del.)	Relevance FRE 403	AstraZeneca
5		7/17/03	Transcript of the Plea Hearing conducted by Honorable Joseph J. Farnan, Jr. in <i>United States v. Robert A. Berkman, M.D.</i> , Criminal Action No. 03-45 (D. Del.)	Relevance FRE 403	AstraZeneca

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
6		4/19/04	Examples of Zoladex labels presented as Exhibits at the Ohio State Licensing Board Hearing for Robert A. Berkman, M.D.	Relevance FRE 403	AstraZeneca
7		9/18/04	Information filed by the U.S. Attorney in <i>United States v. Saad Antoun, M.D.</i> , Criminal Action No. 02-13 (D. Del.)	Relevance FRE 403	AstraZeneca
8		9/18/02	Memorandum of Plea Agreement in <i>United States v. Saad Antoun, M.D.</i> , Criminal Action No. 02-13 (D. Del.)	Relevance FRE 403	AstraZeneca
9	BERKMAN 0212-21	5/16/03	Memorandum and Plea Agreement in <i>United States v. Robert A. Berkman, M.D.</i> , Criminal Action No. 03-45 (D. Del.)	Relevance FRE 403	AstraZeneca
10	HOPKINS 0122-25	9/18/02	Superseding Information filed by the U.S. Attorney in <i>United States v. Stanley C. Hopkins, M.D.</i> , Criminal Action No. 02-127 (D. Del.)	Relevance FRE 403	AstraZeneca
11		12/17/02	Memorandum and Plea Agreement in <i>United States v. Stanley C. Hopkins, M.D.</i> , Criminal Action No. 02-127 (D. Del.)	Relevance FRE 403	AstraZeneca
12		11/6/03	Transcript of Sentencing Hearing in <i>United States v. Robert A. Berkman, M.D.</i> , Criminal Action No. 03-45 (D. Del.)	Relevance FRE 403	AstraZeneca
13		2/5/04	Letter from Judge Joseph J. Farnan, Jr. to the State Medical Board of Ohio	Relevance FRE 403	AstraZeneca
14	AZ0237142-163	11/3/95	Memorandum from Market Strategy & Contract Operations and the Zoladex Marketing Team	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
15	AZ0431807-811	10/19/00	E-mail from Margaret Hammons to George Gerhart III	No objection	
16	AZ0427821-858	3/8/99	Letter from Jacqueline Connelly to Howard Kaplan	No objection	
17	AZ0465663-665	11/30/01	E-mail exchange re: Drug Topics Red Book and PDR	No objection	
18	AZ0449165-167	6/26/01	E-mail from John Freeberry to Rick Bartels	Relevance	AstraZeneca
19	AZ0021762-765	1/23/96	Internal memorandum from Keith Patterson to Chris Iacono	No objection	
20	AZ0237142-163	11/3/95	Memorandum from Market Strategy & Contract Operations Zoladex Marketing Team to Chris Iacono	No objection	
21	AZ0435309-316		Document titled "Implementation of Catalog Price Changes"	No objection	
22	FDB-AWP-16989-996	7/2/01	Fax to First Data Bank from Sandra Bell	Relevance	AstraZeneca
23	AZ0449541-545	5/9/00	E-mail from John Freeberry to Richard Hedinger	Relevance	AstraZeneca
24	AZ0435202-212	5/15/01	Fax from Judy Roberts to Carol Flanagan	No objection	
25	AZ0435213-214	5/18/01	Fax to First Data Bank attaching AstraZeneca Revised Price List	Relevance	AstraZeneca
26	AZ0445417-424	8/22/00	E-mail from Barnabas Desta to Joan McDevitt	Relevance	AstraZeneca
27	AZ0080413-417	11/3/95	Memorandum from Market Strategy & Contract Operations to Chris Iacono re: Zoladex Pricing and Volume Discount Strategy	No objection	
28	AZ0036643	4/22/96	Memorandum from Paula Jordon to Fred Roberts re: Zoladex (goserlin acetate) Projects	No objection	
29	AZ0036585	1/29/96	Letter from Paula Jordon	No objection	
30	AZ0465663-665	11/30/01	E-mail from John Freeberry to Mark Boyer	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
31	AZ0473119	11/27/02	E-mail from Janet Rosenberg to Traci Kellam	Relevance	AstraZeneca
32	AZ0433750-756	2/27/02	E-mail from Monique Loeffert to Debra Ann Ivey	No objection	
33	AZ0437459-460	1/3/99	E-mail from Barbara Villani to Joseph Mansfield	No objection	
34	AZ0426708, 0426710-13	7/14/97	E-mail from Kaylor Kowash to Rickards, Arenson and Caswell	No objection	
35	AZ0037022		Handwritten Note	No objection	
36	AZ0017129	7/26/96	Memorandum from MRP to Zeneca File re: Conversation with Mark Reisenauer 7/19/96	Hearsay	AstraZeneca
37	AZ0036510-33	6/00/95	Document titled "Zoladex Reimbursement Hotline Activity Report – June 1, 1995 – June 30, 1995" prepared for Zeneca Pharmaceuticals by State & Federal Associates Inc.	No objection	
38	AZ0105879-881		Letter from Chris Bowman to Members of the "Maricopa Urology Lithotripsy Inc." Group	No objection	
39	AZ0096359		Letter from Chris Bowman to Sheila	No objection	
40	AZ0464087	9/13/00	E-mail from John Freeberry to Julie-Ann Tracy	No objection	
41	AZ0445640-641	6/29/01	E-mail from Barnabas Desta to David Meddis	No objection	
42	AZ0407062-065	00/00/02	Sales Representative Call Notes	Relevance	AstraZeneca
43	AZ0431262-71		AstraZeneca Pharmaceuticals Agreement	No objection	
44	AZ0237164-69	11/20/95	Internal Memorandum to Chris Iacono from Keith Patterson	No objection	
45	AZ0024479-81	1/19/96	Internal Memorandum to Chris Iacono from Keith Patterson	No objection	
46	AZ0011640	9/10/96	September 10, 1996 letter from M. Painter to M. Reisenauer	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
47	AZ0011635-36	4/28/97	Letter from M. Painter to T. Arenson	No objection	
48	PXL01258-66	8/6/96	Fax from C. Ware to M. Reisenauer	No objection	
49	HOWE0052-57		Patient Financial History Prepared by Oregon Urology Specialists	Relevance FRE 403 Hearsay	AstraZeneca
50	HOWE0120		Billing Statement to Mr. Howe	Relevance FRE 403 Hearsay	AstraZeneca
51	HOWE0020-21		Medicare Summary Notice	Relevance FRE 403 Hearsay	AstraZeneca
52	HOWE0010		Cancelled Check #3995 for \$118.81 Made Out to Oregon Urology Specialists	Relevance FRE 403	AstraZeneca
53	TOWN500-503		Patient Financial History Report	Relevance FRE 403 Hearsay	AstraZeneca
54	TOWN0001-2		Cancelled Checks Made Payable to Mr. Townsend's Urologist, Dr. E. Richard Grieco	Relevance FRE 403	AstraZeneca
55	TOWN 0056		Medicare Summary Notice	Relevance FRE 403 Hearsay	AstraZeneca
56	AZ0702243-46	10/16/04	Email of Erik Schultz	Relevance	AstraZeneca
57	AZ 0044059-63	10/13/95	Letter to Mark J. Harberberger from William C. Lucas	Relevance FRE 403	AstraZeneca
58	ABT 48686-96	12/18/95	Letter from Mark J. Harberberger to William C. Lucas	Relevance FRE 403	AstraZeneca
59	ABT 48560-76	9/26/95	Letter from Mark J. Harberberger at Abbott to Glenn M. Engleman at AstraZeneca	Relevance FRE 403	AstraZeneca

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
60		6/4/03	Corporate Integrity Agreement between AstraZeneca and the Office of Inspector General of the Department of Health & Human Services, signed by AstraZeneca	FRE 403	AstraZeneca
61	AZ0491331-43	2/10/03	CMS Account Team Kickoff Meeting	No objection	
62	AZ0037011	4/12/95	Internal Memorandum from Ruth Beedle re: Zoladex Profitability	No objection	
63	AZ0037036-48	9/5/95	Internal Memorandum from Tom Chen to Mike Bonney re: Zoladex Sample Inventories	Relevance FRE 403	AstraZeneca
64	AZ0010307-09	4/6/96	Memorandum to Keith Patterson from Tom Chen re: TAP Response to Zoladex Case Quantity Discount	No objection	
65	AZ0036661	5/7/96	Memorandum to Mark Reisenauer, Tom Chen from Paula Jordon re: Payer Education Mailings	No objection	
66	AZ0577665-71	6/24/99	Cost and Suggested List	No objection	
67	AZ0431261-71	6/24/02	Email from Nancy Jones to Holle Terkhorn re: Annual Buy Group Zoladex Contract Template	No objection	
68	AZ0461415-65	6/2/00	Urology Portfolio Strategic Plan – TALT Update	No objection	
69	AZ0004616-38		Zoladex Strategic Summary – 1998-2002 by Keith Patterson	No objection	
70	AZ0682890-907	00/00/03	Zoladex 2003 EFAR Forecast	No objection	
71	AZ0689131-37	12/22/03	Email from Kathryn Jones re: Data to Support Additional Payment for Part B Drugs in 2004	Hearsay	AstraZeneca

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
72	AZ0463635-38	1/23/02	Email from John Freeberry to Ena West & Erik Schultz re: Pricing New Specs	No objection	
73	AZ0464456	1/00/02	Pricing News	No objection	
74	AZ0707711-34		Zoladex Market Pricing	No objection	
75	AZ0462355-56	4/4/00	Email from Joan McDevitt re: Revised AZ Competitors Report	No objection	
76	AZ0461108-10	10/17/02	Email from Erik Schultz to John Freeberry re: AWP White	No objection	
77	AZ0005740-41	8/21/96	Internal Memorandum from Mark Reisenauer to Steve Strand re: Zoladex Pricing Recommendations	No objection	
78	AZ0013233-35	10/24/96	Internal Memorandum from Mark Reisenauer to Keith Patterson and Steve Strand re: Zoladex Price Increase Recommendation	No objection	
79		11/20/95	Internal Memorandum from Keith Patterson to Chris Iacono re: Zoladex Pricing Strategy	No objection	
80	AZ0438395-97	1/06/00	Email to JoAnn Smith from Charles Dadonna	No objection	
81	AZ0437058-60		LHRH Cost Comparison	No objection	
82	AZ0437062		Patient on 4 10.8mg Injections	No objection	
83	AZ0422502-13	4/30/97	Internal Memorandum from Product Management Team for Zoladex to Oncology Care Representatives & Area Business Specialists re: New Options for Credit Card Payments for Zoladex	No objection	
84	AZ0422517-18	7/28/99	Corporate or Business Structure Questionnaire	No objection	
85	AZ0422520		History of Zoladex Pricing	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
86	AZ0422592		Comparison of 25 Patients on 3 Month Zoladex Therapy for 1 Year vs. 4 Month Lupron Therapy for 1 Year	No objection	
87	AZ0422630-39	06/00/01	AstraZeneca Pharmaceuticals LP – Integrated Health Systems – Zoladex (goserelin acetate implant)	No objection	AstraZeneca
88	AZ0424228		Comparison of 116 Patients on 3 Month Zoladex Therapy for 1 Year vs. 4 month Lupron Therapy for 1 Year	No objection	
89	AZ0431034-65	3/4/02	Email from Nancy Jones to Eugenia Glessner re: Lakes Region General Hospital and St. Mary's Regional Medical Center IHS contracts	No objection	AstraZeneca
90	AZ0431073	1/12/99	Draft Letter to Physician from Kulda & Heisey re: Zoladex Price Increase	No objection	
91	AZ0694210-65	04/00/03	Office of Inspector General – Compliance Program Guidance for Pharmaceutical Manufacturers	Relevance	AstraZeneca
92	PTX01034	1/19/95	Letter to Enid Olayan from Carol Ware	No objection	
93	PXL05552-602	8/20/93	Letter to Keith Patterson from Carol Ware enclosing report on Zoladex calls	No objection	
94	PXL05638-991	2/23/94	Letter to Keith Patterson from Carol Ware enclosing report on Zoladex calls	No objection	
95	PXL06067-594	2/23/96	Letter to Keith Patterson from Carol Ware enclosing report on Zoladex injuries	No objection	
96	PXL01037	1/20/95	Fax from Carol Ware to Medicare Part B Carrier	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
97	AZ0036923-26	6/14/96	Memo to Mike Murray from Carol Ware re: CIGNA Medicare Bulletin	No objection	
98	AZ0021569-71	6/17/96	Fax to Keith Patterson & Mark Reisenaur from Carol Ware re: Colorado Medicare Part B	No objection	
99	PXL01803-04	2/29/96	Letter to Carol Ware from Sue Walker	No objection	
100	PXL03970-76	10/14/98	Total Proposals Pending	No objection	
101			Zoladex Label	Relevance FRE 403	AstraZeneca
102			Zoladex Labeling	Relevance FRE 403	AstraZeneca
103		4/18/97	Handwritten Agreement	Hearsay Authentication Relevance FRE 403	AstraZeneca
104			Lupron Depot 4-Month (30mg) Advantages	No objection	
105		1/29/96	Zoladex Cost Comparison	No objection	
106		4/10/98	Letter to Annual Contract Customer from Kathleen Sailer & Earl Heisey	No objection	
107			Zoladex Annual Contract	No objection	
108			Invoice	Relevance FRE 403	AstraZeneca
109	AZ0487753-56	2/1/93	Suggested List Prices and Marketing Policy	No objection	
110	AZ0427978-85	6/2/98	U.S. Wholesale Druggists Cost and Suggest List Prices	No objection	
111	AZ0018042-44	11/4/96	Internal Memorandum from Mark Reisenauer to Bob Black & Jim O'Shea re: Zoladex Price Increase Recommendation	No objection	
112	AZ0096314		1-Month Depot Zoladex	No objection	
113	AZ0096386-88	9/26/95	Memo to Gary Hansen from Chris Bowman re: NSS- "Purchase Groups"	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
114	AZ0096255-59	8/29/97	Email from Christopher Bowman re: Updated "Cheat Sheets"	No objection	
115	AZ0096293		Draft Letter to Ben from Chris Bowman	No objection	
116	AZ0428238-62		Zoladex Strategic Summary 1997-2001 prepared by Keith Patterson	No objection	
117	AZ0004734-55	4/20/95	Zoladex Strategic Plan 1996-2000 – Draft #1 by Keith Patterson	No objection	
118	AZ0010334-37	1/12/95	Memorandum to Chris Iacono from Keith Patterson re: Zoladex Pricing Strategy	No objection	
119	AZ0010297-302	3/1/95	Memorandum to William Simpson from Keith Patterson re: Zoladex Pricing	No objection	
120	AZ0029298-99		Handwritten Notes	No objection	
121	AZ0043915-95	11/3/95	Draft Memorandum to Chris Iacono from Market Strategy & Contract Operations re: Zoladex Pricing and Volume Discount Pricing	No objection	
122	AZ0017849-51	10/24/96	Internal Memorandum from Mark Reisenauer to Keith Patterson & Steve Strand re: Zoladex Price Increase Recommendation	No objection	
123	PXL 06595-661	12/27/96	Letter to Keith Patterson from Sean Coakley & Stephanie Wagoner	No objection	AstraZeneca
124	PXL01040	2/15/95	Letter to Travelers Railroad Medicare from Sean Coakley	No objection	
125	PXL01045	2/23/95	Letter to Ms. Rita Crook, North Carolina Medicare Part B from Sean Coakley	No objection	

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126	PXL01111-13	5/2/96	FOIA request to Kelly Gross, Blue Shield of California from Sean Coakley	No objection	
127	PXL01116	5/14/96	Letter to Medicare Part B Claims Review from Sean Coakley	No objection	
128	PXL01731-34	7/9/96	Letter to Laura Brooks from Sean Coakley re: Pricing for Zoladex 3.6 mg (goserelin acetate implant) – HCPS J9202	No objection	
129	PXL01702-11	8/8/96	Letter to Irene Michel, Minnesota Medicare Part B from Sean Coakley	No objection	
130	PXL06662-725 PXL04626-96 PXL04697-763 PXL04764-824 PXL04825-90 PXL04891-949 PXL04950-5003 PXL05004-65 PXL05117-69 PXL07273-334 PXL05232-328		Reimbursement Hotline Monthly Reports Prepared by Parexel for 1997	No objection	
131	AZ0419345-48		Medicare Review	No objection	
132	AZ021838	10/12/95	Internal Memorandum from Thomas Chen to Keith Patterson re: Price Increase for Zoladex	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
133	AZ0080407-11	11/20/95	Internal Memorandum from Keith Patterson to Chris Iacono re: Zoladex Pricing	No objection	
134	AZ0376204-17		AstraZeneca Urology Representative Training	No objection	
135	AZ0565611-14	1/30/02	Email to David Brennan & John Freeberry from Rachel Bloom-Baglin re: AWP Spread "White Paper"	No objection	
136	AZ0096241-42	12/5/97	Email from John Armstrong re: Zoladex Spreadsheet	No objection	
137	AZ0413687-91	3/7/02	Fax to Soleil Chavoshi from John Armstrong re: Competitive Pricing	No objection	
138	AZ0423944-50		LHRH Cost Comparison	No objection	
139	AZ0432026-34	3/13/01	Email from John Freeberry re: Change in AWP Spread	No objection	
140	AZ0449836-50	8/9/00	Email from John Freeberry to Joan McDevitt Re: Redbook	No objection	
141	AZ0438780-81	1/17/00	Email from Kenneth Smith re: Comparison of 3 month Zoladex & 3 month Lupron (New AWP & Pricing)	No objection	
142	AZ0016060-74		Proposed Zoladex Contracting Strategy	No objection	
143	AZ0044002-13	1/26/96	Zoladex 3-Month 10.8mg Depot Pricing Proposal	No objection	
144	AZ0024179-90	00/00/95	Zoladex Prostate Cancer 1995 Operational Plan	No objection	
145	AZ0021833	11/14/95	Internal Memorandum to Keith Patterson from Chris Iacono re: Zoladex	No objection	
146	AZ0040464	11/4/97	Internal Memorandum to C. J. Iacono from M. L. Rickards re: 1998 Pricing Recommendations – Prostate Cancer Portfolio	No objection	
147	AZ0000134-43		Zoladex Strategic Plan 1993-1997	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
148	AZ0097294-95	6/24/97	Email from John Armstrong to Timothy Arenson re: 1998 Price Positioning	No objection	
149	AZ0095847-53	11/5/97	Email from John Armstrong to Jean Ludwig, Kenneth Smith and John Wawrzonek re: Zoladex vs. Lupron Cost & Profit Comparison	No objection	
150	AZ0424496-98	3/27/98	Internal Memorandum from Sales & Marketing Management Team for Zoladex & Casodex re: Competitive Pricing for Flutamide and Leuprolide	No objection	AstraZeneca
151	AZ0044713-14	11/3/97	Email from Dean McAlister to Timothy Arenson re: Response: ZOLPRICE93.xls	No objection	
152	AZ0438474-76	2/15/01	Email from Jeffrey McVey to Ronald Danhoffer re: Highmark Lupon/Zoladex Letter	No objection	
153			Call Notes	No objection	
154	AZ0010394-99	3/3/94	Memorandum from Keith Patterson to W.J. O'Shea re: Zoladex Quantity Discount Recommendations	No objection	
155	PXL03686-715		Guide to Coverage and Reimbursement	No objection	
156	AZ0000062-85	6/21/94	Draft #1 Zoladex Strategic Plan 1995-1999	No objection	
157	AZ0427246-65	7/7/97	Proposed Zoladex Contracting Strategy	No objection	
158	AZ0032538-43	2/17/95	Memorandum to William Simpson from Keith Patterson re: Zoladex Pricing	No objection	
159	PXL02766-812		Zoladex Coverage & Reimbursement Physician's Office Guide	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
160	AZ0428327-50		Zoladex Strategic Summary 1998-2002	No objection	
161	AZ0017131-36	1/23/96	Internal Memorandum from Keith Patterson to Chris Iacono re: Zoladex Pricing Recommendations	No objection	
162	AZ0021679-81	12/2/96	Internal Memorandum from Mark Reisenauer re: Zoladex Price Increase	No objection	
163	AZ0022136-46	2/00/96	US Business Review – February 1996 – Zoladex prepared by Keith Patterson	No objection	
164	PXL00095-96	7/17/96	Memo to Keith Patterson, Mark Reisenauer, Tom Chen from Howard Tag re: Medicare Reimbursement	No objection	
165	AZ0010338-39	1/19/95	Internal Memorandum from Keith Patterson to Chris Iacono re: Zoladex Pricing	No objection	
166	AZ0715813-943		Price Analysis	No objection	
167	AZ0463627-29	1/28/02	Email from Jill Krating to Erik Schultz re: NEW PDF of Pricing News	No objection	
168	AZ0464857-59	3/1/02	Email from Erik Schultz to Jill Krating re: AWP Spread	No objection	
169	AZ0373269	3/17/97	Fax to Frederick Hollon, M.D. from Jack Wawrzonek	No objection	
170	AZ0096737-38	12/1/97	Fax to Jeffrey Frankel, M.D. from Jack Wawrzonek re: Zeneca Annual Zoladex Contract	No objection	
171	AZ0094769	9/5/97	Email from Cathy Chakos to Kenneth Smith & John Wawrzonek re: Fay Alliance	No objection	
172	AZ0437244-47	3/30/99	Email from John Wawrzonek to Todd Orsi re: Annual Contract	No objection	
173	AZ0373195		AstraZeneca Code of Conduct (CD)	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
174			Video Deposition of Dr. Robert A. Berkman	Relevance FRE 403	AstraZeneca
175		4/4/06	Amended Version of AstraZeneca Pharmaceuticals LP's and Zeneca, Inc.'s Responses to Plaintiff's Interrogatories and Requests for Admission in Montana	Relevance	AstraZeneca
176		4/9/04	Answer of Bristol-Myers Squibb Company, Oncology Therapeutics Network Corporation and Apothecon, Inc. to Plaintiffs' Amended Master Consolidated Class Action Complaint (Excerpts Only)	No objection if entire answer is offered	BMS
177		7/26/04	Defendant BMS's Responses to Plaintiffs' Interrogatories to the Fast Track Defendants	No objection	
178		1/19/04	Responses and Objections of Defendants Bristol-Myers Squibb Company, Oncology Therapeutics Network Corporation and Apothecon, Incorporated to Plaintiffs' Request for Production of Documents and Interrogatories (Excerpts Only)	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
179	BMS/AWP/0 00092170- 86; BMS/AWP/0 000468-77; BMS/AWP/0 005335-51; BMS/AWP/0 030828-42; BMSAWP/0 017275-78; BMS/AWP/0 00092406; BMS/AWP/0 1071969-70 BMS/AWP/0 030824-25	Various Dates	Composite exhibit of various letters to publishers from BMS	No objection	
	BMS/AWP/0 000468-77			Object to Apothecon prices, relevance, FRE 403; see BMS <u>in limine</u> motion re Apothecon	BMS
	BMS/AWP/0 005335-51			Object to Apothecon prices, relevance, FRE 403; see BMS <u>in limine</u> motion re Apothecon	BMS
	BMS/AWP/0 030828-42			No objection	
	BMSAWP/0 017275-78			Relevance FRE 403; refers only to drugs not in the case	BMS
	BMS/AWP/0 00092406			No objection	
	BMS/AWP/0 1071969-70			Relevance FRE 403; refers only to drugs not in the case	BMS

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
	BMS/AWP/0 030824-25			No objection	
180	BMS/AWP/0 00186646-49	8/22/95	Price Increase/Decrease Notification Process	No objection	
181	BMSAWP/0 005609-22		Red Book Product Listing Verification	No objection	
182	BMSAWP00 05571-608		Red Book Product Listing Verification	Relevance; FRE 403; refers to Apothecon drugs; see BMS <u>in limine</u> motion re Apothecon	BMS
183	BMSAWP00 11245-48		Letters from Kaszuba to publishers changing markup factor	No objection	
184		9/18/04	Affidavit of Denise M. Kaszuba	No objection	
185	BMS/AWP/0 041865-69	5/28/93	Memo from S. Tarriff to "List" re: List Price Increase Oral Antibiotics	Relevance; FRE 403; refers to Apothecon drugs; see BMS <u>in limine</u> motion re Apothecon	BMS
186	BMS/AWP/0 00275052-59		Glucophage XR Price Increase	Relevance FRE 403; refers only to drugs not in the case	BMS
187	BMS/AWP/0 1109780-84	4/22/02	Email from Greg Fersko to various attaching Powerpoint slides	No objection	
188	BMS/AWP/0 0337637-41		Pricing procedures	Relevance; FRE 403; refers to Apothecon drugs; see BMS <u>in limine</u> motion re Apothecon	BMS
189	BMS/AWP/0 1088203-11	4/30/02	Email from Leigh Anne Leas to various attaching Powerpoint slides	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
190	BMS/AWP/0 1112957-82; BMS/AWP/0 1190197- 222; BMS/AWP/0 1071974- 2011		Composite exhibit of three Internal Price Lists	Object to extent document relates to drugs not in the case; also object to 1072001-2011 which refers to Apothecon drugs; relevance; FRE 403; see BMS <u>in limine</u> motion re Apothecon	BMS
191	BMSAWP/0 011361-67		Pocket Reference Price List	Relevance	BMS

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
192	BMSAWP/0 028888-87 (May/June 1994); BMSAWP/0 028868-79 (November/ December 1994); BMS/AWP/0 00095588- 611 (January/Feb ruary 1997); BMS/AWP/0 00095612-23 (March/April 1997); BMS/AWP/0 00095624-35 (May/June 1997); BMS/AWP/0 00095636-47 (July/August 1997); BMS/AWP/0 00095648-63 (September/ October 1997); BMS/AWP/0 000955559- 900 (January/Feb ruary 1998); BMS/AWP/0 00095901-16 (March/April 1998); BMS/AWP/0 00095664-79 (May/June 1998); BMS/AWP/0 00095804-19 (September/ October 1998); BMS/AWP/0 00095820-36 (November/ December 1998)		Composite exhibit of issues of OTN <i>The Network News</i>	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
	BMS/AWP/0 00095699- 714 (March/April 1999); BMS/AWP/0 00095715-30 (May/June 1999); BMS/AWP/0 00095731-46 (September/ October 1999); BMS/AWP/0 00095766-83 (November/ December 1999); BMS/AWP/0 00095747-65 (April 2000); BMS/AWP/0 00095784- 803 (May 2000); BMS/AWP/0 00095861-84 (August 2000)				
193	BMS/AWP/0 01486072- 73, 001486090		OTN AWP Price Report	Authenticity Incomplete	BMS
194	BMS/AWP/0 00469286-99		Executive Summary	No foundation Hearsay Not prepared by BMS	BMS
195	BMS/AWP/0 1327211		AWP (Ain't What's Paid)	Lack of foundation	BMS
196	BMS/AWP/0 1088191-202		Understanding AWP's	No objection	
197	BMS/AWP/0 00096632-43	7/11/00	Reimbursement in Office Based Oncology	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
198	BMS/AWP/0 00393437- 464		Reimbursement	Authenticity; incomplete document; lack of foundation; unclear as to whether authored by BMS; source of document unclear; hearsay	BMS
199	BMS/AWP/0 00096900-12	4/6/00	Memo from Barbara Nathan to John Akscin, among others	No objection	
200	BMS/AWP/0 00094558- 603		BMS Portfolio Marketing Strategy Marketing Choices	Unidentified handwriting; lack of foundation	BMS
201	BMS/AWP/0 00153461	12/5/97	Memorandum from Ron Miller to Mark Durand re: Oncology Policy Issues,	No objection	
202	BMS/AWP/0 00071159-62	1/10/03	Email from Barnard to various	No objection	
203	BMS/AWP/0 00056970- 70150		Taxol contract sales	Lack of foundation	BMS
204	BMS/AWP/0 00096291- 300	3/19/03	Oncology Customer Contract Proposal and Consortia contract pricing	No objection	
205	BMS/AWP/0 00096333-45	1/16/03	Oncology Customer Contract Proposal and Owen contract pricing	No objection	
206	BMS/AWP/0 0979750-803	1/17/03	Email from Barnard with Premier contract pricing	No objection	
207	BMS/AWP/0 1124131-56	3/16/03	Email from Barnard with MHA contract pricing	No objection	
208	BMSAWP/0 011214-35		Etopophos Launch Plan	Relevance, plan was not adopted	BMS

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
209	BMSAWP/0 000597-617; BMSAWP/0 000647-51		Various Kaszuba letters and memos	Relevance; FRE 403; documents refer to Apothecon drugs; see BMS <u>in limine</u> motion re Apothecon	BMS
210	BMSAWP/0 000574-87		Albuterol pricing	Relevance; FRE 403; documents refer to Apothecon drugs; see BMS <u>in limine</u> motion re Apothecon	BMS
211	BMSAWP/0 000095-120		Trimox pricing	Relevance; FRE 403; documents refer to Apothecon drugs; see BMS <u>in limine</u> motion re Apothecon	BMS
212	BMS/AWP/0 00217841-51	1/19/02	Marre email with Premier and Duke contract pricing	No objection	
213	BMS/AWP/0 00212669-74		Blenoxane contract sales	No objection	
214	BMS/AWP/0 1123962-74	3/5/03	Mayank email with VePesid analysis	No objection	
215	BMS/AWP/0 00071256-72		Christof Marre, "Taxol Generic Strategy Learnings from the U.S.	No objection	
216	BMS/AWP/0 1190031-55	4/7/02	Sippel email attaching Taxol Opportunity Plan	No objection	
217	BMS/AWP/0 01501681	8/22/01	Email from Sandy McMahon re: Taxol Questions	No objection	
218	BMS/AWP/0 0478735-74		Livin Beat – Customer Marketing	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
219	BMS/AWP/0 00097131- 37, at 000097134- 36		OTN Cost Differential Report	No objection	
220	BMS/AWP/0 00096965-85		BMS Overview: Values Unique to POHMS	No objection	
221	BMS/AWP/0 00157423-35		Taxane Economics: Effect of Dose and Schedule	No objection	
222	BMS/AWP/0 01502304-38		Practice Efficiencies & Quality Care Workshop – Of Special Interest To: Physicians, Nurses, Office Managers, Billers	No objection	
223	BMS/AWP/0 00192875-76	1/30/01	Email from Janine Suscewicz transmitting Jan 26 Memo and accompanying BMS interrogatory responses to which the documents were attached	No objection	
224	BMS/AWP/0 01491629-32		Composite exhibit of Soule spread marketing documents	No objection	
	Soule Dep. Ex. 8			Lack of foundation, hearsay as to unidentified handwriting	BMS
	BMS/AWP/0 01494633 BMS/AWP/0 01491634 BMS/AWP/0 01491635 BMS/AWP/0 01491378-80			No objection	
225	BMS/AWP/0 01508047-61 BMS/AWP/0 01508114-17		Composite exhibit of Davidson spread marketing docs	No objection	
226	BMS/AWP/0 1233083-184	3/18/03	Greg Bell/Charles River Associates email attaching docs including Paraplatin Deconversion Powerpoint	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
227	BMSAWP/0 028479-86	1/1/95	BMS-OTN sales agent agreement	No objection	
228	BMS/AWP/0 01483218-27	4/22/03	Marsha Peterson email and business plan	No objection	
229	BMS/AWP/0 1FRE 403078		Composite exhibit of call notes	No objection	
	BMS/AWP/0 1406365			No objection	
	BMS/AWP/0 1404191			No objection	
	BMS/AWP/0 1404200			No objection	
	BMS/AWP/0 1404123			No objection	
	BMS/AWP/0 1408993			No objection	
	BMS/AWP/0 1408985			BMS objects; duplicate of 1408993	BMS
	BMS/AWP/0 1402293			No objection	
	BMS/AWP/0 1409167			No objection	
	BMS/AWP/0 1402215			No objection	
	BMS/AWP/0 1418108			No objection	
	BMS/AWP/0 1418525			No objection	
	BMS/AWP/0 1418646			No objection	
	BMS/AWP/0 1418692			No objection	
	BMS/AWP/0 1418664			No objection	
	BMS/AWP/0 1414388			Lack of foundation; hearsay; author not identified	BMS
	BMS/AWP/0 1415895			No objection	
	BMS/AWP/0 1414599			No objection	
	BMS/AWP/0 1414604			No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
	BMS/AWP/0 1414608			No objection	
	BMS/AWP/0 1402192			No objection	
	BMS/AWP/0 1402277			No objection	
	BMS/AWP/0 1415362			No objection	
	BMS/AWP/0 1421942			No objection	
	BMS/AWP/0 1423009			No objection	
	BMS/AWP/0 1FRE 403078			No objection	
	BMS/AWP/0 1421479			Lack of foundation; hearsay; author not identified	BMS
	BMS/AWP/0 1420643			No objection	
	BMS/AWP/0 1402251			No objection	
	BMS/AWP/0 1414566			No objection	
	BMS/AWP/0 1426459			No objection	
	BMS/AWP/0 1406236			Lack of foundation; hearsay; author not identified	BMS
	BMS/AWP/0 1407052			Lack of foundation; hearsay; author not identified	BMS
	BMS/AWP/0 1FRE 403600			Lack of foundation; hearsay; author not identified	BMS
	BMS/AWP/0 01491764-68			No objection	
	BMS/AWP/0 01491769-71			No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
	BMS/AWP/0 01491859-63			No objection	
	BMS/AWP/0 01491646			No objection	
230	BMS/AWP/0 00056952-69	11/1/02	Pricing & Institutional Operations Overview	No objection	
231	BMS/AWP/0 01502339	3/4/02	Memo from Denning to Keighley	No objection	
232	BMS/AWP/0 00956887, BMS/AWP/0 00083788- 839	2/4/03	Akscin email attaching “Law & Order: OBO” PowerPoint	No objection	
233	BMSAWP/0 005551-70	3/4/94	Fax from MediSpan with AWPs	No objection	
234	BMS/AWP/0 00217958-90		OBO Opportunities	No objection	
235	MDL- OBI0000762 8	12/7/00	Letter from Robert Savage re: Correspondence from Pete Stark	Incomplete (missing MDL- OBI00007629) [See Ex. 2780]	J&J
236	MDL- OBI000FRE 40389-90	08/00/00	Email from Catherine Piech re: Amgen AWP Spread Change to 25%	No objection	
237	WKH77797- 801	2/13/97	Price Change Notifications	Hearsay Not properly authenticated/ lacks proper foundation	J&J
238	WKH 02434- 438	1/6/98	Urgent – Price Change Information	Hearsay	J&J
239	WKH 02446- 447	1/7/00	Price Change	Hearsay	J&J
240	MDL- OMP004979 8		Ortho Biotech Inc. Pricing Strategy	Not properly authenticated/ lacks proper foundation	J&J
241			Contracting Initiatives	No objection	
242	MDL- OBI0005888 8-923		1998 Reimbursement Update and Challenges	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
243	MDL- OBI0000664 1-98	6/21/99	Document titled "Shaping the Reimbursement Environment for Procrit: Ortho-Biotech, Inc. Discussion Document June 21, 1999"	Hearsay	J&J
244	MDL- OBI0000837 4-75	11/7/00	Memorandum from John Dempsey to Gary Reedy and Bill Pearson re: Price Increase	No objection	
245	MDL- OBI0006364 3		Physician Economic Impact: Procrit vs. Transfusions RED ALERT	Not properly authenticated/ lacks proper foundation Hearsay FRE 403	J&J
246	MDL- OBI0001215 8		Oncology Franchise Objections & Responses	No objection	
247	MDL- OBI0005413 -15		POA 3 District Manager Pre-Work	No objection	
248			Charts regarding Procrit	No objection	
249	MDL- CEN000027 17-878	3/25/98	Remicade cA2 Marketing Plan U.S. Crohn's Indication Launch	No objection	
250	WKH 01029	9/1/98	Letter Ron Krawczyk to Kathy Gutegesell at FirstData Bank	Hearsay	J&J
251	MDL- CEN000210 66	4/3/01	Email from Joseph Scodari to Dave Holveck re: AWP Issue-Discussion with Shannon Salmon	No objection	J&J
252	MDL- CEN000034 78-500		Remicade Office Based Infusion Guide	No objection	J&J
253	MDL- CEN000036 07-73	00/00/00	Practice Management Program for Remicade	No objection	J&J

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
254	MDL- CEN000902 85-302	12/18/03	Powerpoint titled "Local Payer Information" Laura Glassco- National Account Manager, Ken Wegner- Regional Account Manager; Centocor, Inc.	No objection	
255	MDL- OBI0005490 9-13	6/15/92	Pharmaceutical Sales Agreement with Caremark	No objection	
256	MDL- OBI0005507 8-82	1/7/93	Pharmaceutical Sales Agreement with Stadtlanders	No objection	
257	TAP GB 08146	6/8/94	Memorandum to Alan MacKenzie re: Medicare Proposal	Hearsay Not properly authenticated/ lacks proper foundation Relevance	J&J
258	DD 0081-82	6/21/95	Memorandum to Don Patton from Alan MacKenzie re: Meeting with Ann Vickery of Hogan and Hartson	Hearsay Not properly authenticated/ lacks proper foundation Relevance	J&J
259	MDL- OBI0005884 2-44	1/7/98	Email from Cathleen Dooley	No objection	
260	MDL- CEN000085 404-05	7/6/99	Memorandum from Centocor's Michael Ziskind to Jason Rubin	No objection	
261	MDL- CEN001080 51-54	11/5/98	Letter to C. Klaye Riley from Valerie	No objection	
262	MDL- OBI0006105 2-053	12/2/97	Memorandum from C. Dooley to G. Reedy	No objection	
263	MDL- OMO004963 8-39	12/3/97	Memorandum from Gary Reedy to Carol Webb	No objection	
264	MDL- CEN000711 34		Computer Screen Printout	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
265	MDL- OBI0003067 5-84	4/10/01	Letter to Alpine Hematology Oncology from Elaine King	No objection	
266	YOUNG000 1-11; YOUNG021 3-16		Monthly Checks Written by the Youngs and a Couple of Receipts	Relevance Illegible or indecipherable	J&J
267	YOUNG005 4; YOUNG005 2; YOUNG003 5		Invoices showing Remicade Charges	Relevance Illegible or indecipherable	J&J
268	MDL- OBI0006365 6-57	7/10/96	Memorandum to Minneapolis District from John Hess	No objection	
269	MDL- OBI0006364 4-55	3/22/95	Bulletin No. 07 to Orlando District from David Rybak re: 1 st Quarter Successes and Team Experiences	No objection	
270	MDL- OBI0006250 7-661	12/1/92	From Mycrocytic Cells to Macrocytic Sales – Regional Training Workshop Materials held in Houston, Texas	No objection	
271	MDL- CEN000086 707-777		“The Power Within” – Remicade Powerpoint	Illegible	J&J
272	MDL- CEN000902 83-302	11/1/00	E-mail from Laura Glassco to Tom Weiss, et al. re Dr. Kassan with attached PowerPoint titled “Local Payer Information” Laura Glassco- National Account Manager, Ken Wegner- Regional Account Manager; Centocor, Inc.	No objection	
273	MDL- CEN001073 60		PowerPoint – first slide titled “Topics”	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
274	MDL- CEN000900 81-84	8/20/99	Document titled "Cost Comparison of Anti-TNF Agents in Rheumatoid Arthritis Patients Receiving Methotrexate for Plan and Group Managers"	No objection	
275	MDL- CEN000711 33-45	5/21/00	E-mail from Laura Glassco to Darla Ivey, et al. re Stuff with attached document titled: "Cost Comparison of Anti-TNF Agents in Rheumatoid Arthritis Patients Receiving Methotrexate for Plan and Group Managers" dated 8/20/99 and spreadsheets	No objection	
276	MDL- CEN001073 82-83	1/00	Document titled "Practice Management Worksheet for Assessing New Services"	No objection	
277	MDL- CEN001073 84	7/30/99	Document titled "Average Reimbursement for Remicade (infliximab) When Billed by a Physician's Practice"	No objection	
278	MDL- CEN001073 85-89		Document titled "Breaking the Barriers: Essential Tools for Remicade Therapy"	No objection	
279	MDL- CEN000304 66	3/16/98	Interoffice correspondence from Matthew J. Carpenter to J. McHugh and J. Kerrigan re: "Average Acquisition Price vs. Average Acquisition Price" with attached memo from Brian Fitzpatrick to Matt Carpenter re: "AWP vs. Acquisition Pricing" dated 3/13/98	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
280	MDL- CEN000040 03-08	11/18/98	Memo from John McDermott and Alex Shipman to Mary Fisher and Gary Conte re: "Additional Information on AWP Spread"	No objection	
281	MDL- CEN001036 88-90	9/22/02	E-mail from Seth Fischer to Joseph Scodari, et al. re: "AWP Reporting issue: an overview"	No objection	
282	MDL- CEN000546 41-43	5/3/02	E-mail from Michael Ziskind to John Hoffman re: "25% policy analysis1.xls – FINAL FINAL CORRECTION? Ignore prior emails" with attached spreadsheet	No objection	
283	MDL- CEN000041 44-65	6/3/99	PowerPoint – "Presentation to Area Business Managers Mid-Year Recap and Strategy for REMICADE June 3, 1999 Mike Ziskind"	No objection	
284	MDL- CEN001036 57		Document titled "Analysis of Costs for Office IV Administration"	No objection	
285	MDL- CEN000247 08-09	8/20/99	Document titled "Cost Comparison of Anti-TNF Agents in Rheumatoid Arthritis Patients Receiving Methotrexate for Plan and Group Managers"	No objection	
286	MDL- CEN00010F RE 403	3/1/00	Letter from Mike Ziskind to Terri Factora	No objection	
287	MDL- CEN0000FR E 4039-40	6/18/99	Letter from Mike Ziskind to Holli Marchino with fax cover	No objection	
288	MDL- CEN000447 67-68	11/00	Letter from Michael Ziskind to Dear Healthcare Provider with attached "Payer Policy Update Questionnaire for REMICADE (infliximab)"	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
289		2/15/00	Software and document titled "Remicade Practice Management Assistant"	No objection	
290	MDL-CEN000148 40-63	1/00	Document titled "Managed Care Contracting Guide Integrating Infusion Therapies Into Your Practice"	No objection	
291	MDL-CEN000455 82-85	4/3/02	E-mail from Karen Smith to Michael Ziskind re: "In response to your question"	No objection	
292	MDL-CEN0000004 50-57	5/18/01	Interoffice memo from Mike Ziskind to Scott Habig re "Pricing change scenario assessment"	No objection	
293	MDL-CEN000648 95; MDL-CEN00064949-59	5/15/97	Cover sheet titled "cA2 Commercialization Strategy Plan" with attached PowerPoint titled "cA2 Commercialization Strategy cA2 Business Model"	No objection	
294	MDL-CEN000147 46-66	3/6/00	Document titled "Remicade: Physician Practice Management Program"	No objection	
295	MDL-CEN000704 30-31	6/13/01	Interoffice correspondence from Craig Fraser to Immunology Sales Force, et al. re: "Remicade 3.9% Price Increase"	No objection	
296	MDL-CEN000764 65-67	6/26/01	E-mail from Julie McHugh to Mary Heino, et al.	No objection	
297	MDL-CEN000554 12-22	7/1/01	Pharmaceutical Rebate Agreement Between Centocor and John Deere Heath Care, Inc.	No objection	
298	MDL-CEN000703 84-89	7/11/00	E-mail from Stephen Jacobs to Sharon Hunt, et al. re Corporate Accounts SWAT presentation with attached Remicade slides	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
299	MDL-CEN000820 84-100		PowerPoint "Systems Cheryl Cohen Director of Corporate Accounts"	Illegible	J&J
300	MDL-CEN000806 91-92	4/4/02	E-mail from Cheryl Cohen to Michael Ziskind, et al. re: "Thoughts re. Infusion rate strategy & tactics"	No objection	
301	MDL-CEN000361 09-40	1/23/02	E-mail from Cheryl Cohen to Eric Mensh, et al. re "Presentation at our meeting Jan 31, 2002" with attached PowerPoint presentation	No objection	
302	MDL-CEN000327 30-32	8/7/02	E-mail from Cheryl Cohen to Tom Weiss, et al. re "CIGNA & Aetna USHC Reimbursement Clarification"	No objection	
303	MDL-CEN000352 94-310	8/8/02	E-mail from Cheryl Cohen to Tom Weiss re: "Business Plan" with attached PowerPoint "Remicade Corporate Accounts 2002 Business Plan"	No objection	
304	MDL-CEN000327 33-35	8/7/02	E-mail from Cheryl Cohen to Tom Weiss re: "CIGNA & Aetna USHC Reimbursement Clarification"	No objection	
305	MDL-CEN000420 83	6/14/01	E-mail from Kevin Renahan to Immuno_Sales with attached interoffice correspondence	No objection	
306	MDL-CEN000711 50-55	6/22/01	Email from Pamela Carpenter re: Updated Worksheets	No objection	
307	MDL-CEN000002 01; MDL-CEN000004 07-08		Letters from Jim Binova re Price Increases for Remicade	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
308	MDL-CEN000282 26-28	2/14/01	Email from Eric Mensh re: Specialty Pharmacy Memo	No objection	
309	MDL-CEN000282 21-25	4/30/01	Email from Jim Bivona to Tom Weiss re: Top Accounts	No objection	
310	MDL-CEN000085 169-72		Powerpoint Slides – “Regional Account Manager Jim Bivona Centocor Immunology Business Unit – 2001 Business Plan”	Illegible	J&J
311	MDL-CEN000057 73-827	00/00/02	Remicade Corporate Accounts – 2002 Business Plan – “Abbreviated”	No objection	
312	MDL-OBI0001164 1-58	00/00/98	Ortho Biotech Inc. – Strategic Customer Group 1998 Business Plan Overview	No objection	
313	MDL-OBI0000797 1-84	11/19/98	Strategic Customer Group – Integrated Business Plan 1999	No objection	
314	MDL-OBI0004320 3-14	9/28/99	Email from James Linzer to Cathleen re: ibpscg92899.ppt	No objection	
315	MDL-OBI0005930 2-05		Physician Medicare Reimbursement Scenarios	No objection	
316	MDL-OBI0000306 1-81	8/8/00	Integrated Business Plan 2001 – Strategic Customer Group	No objection	
317		6/00/02	2003 SCG Strategy Development – Strategic Accounts Department Plan	No objection	
318	MDL-OBI0000349 2	8/24/98	Email from Cathleen Dooley re: Follow-up of voice mail request	No objection	
319	MDL-OBI0002623 5-36	12/5/01	Email from Ken Nelson re: Avg. Selling Price/CIA Follow up	No objection	
320	MDL-OBI0005484 8-51	1/31/95	Pharmaceutical Sales Agreement – January 30, 1995	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
321	MDL- OBI0005521 8-20	2/24/95	Pharmaceutical Sales Agreement – January 15, 1995	No objection	
322	MDL- OBI0002948 4-91	1/1/01	Rebate Agreement Between Dr. Schafer & Ortho Biotech	No objection	
323	MDL- OBI0005245 5-57	4/7/02	Email from Dick Robbins to John Dempsey re: Big Bet – Distribution	No objection	
324	MDL- CEN000139 65	6/13/01	Ron Krawczyk of Centocor letter to Alisha Nielsen re announcing a 3.9% Price Increase for Remicade	No objection	
325	MDL- OBI0003067 7-684	3/9/01	Document titled Rebate Agreement Between Alpine Hematology Oncology and Ortho Biotech Production signed by Thomas C. Hiriak for Ortho	No objection	
326	JJ-001716- 727	Undated	Document titled REMICADE RA Marketing Plan	No objection	
327	MDL- CEN001036 86-687	9/20/02	Email from Diane Ortiz to David Sheffield, Alex Gorsky, John Szabo, Louise Mehrotra, Kathy Buto, Jerry Holleman re AWP Reporting issue: an overview	Hearsay	J&J
328	MDL- CEN000545 64-567	7/11/02	Email from Angel Ortiz, Jr., to Kathy Buto, Cathleen Dooley re ASP Charts with attachments with attachments (cc: Diane Ortiz, Doris Chern, Michele Murphy, Paul Denofio	No objection	
329	MDL- CEN000444 99-504	6/6/01	Email from Rick Bierly to Tom Weiss, Kirk Barton, Ron Krawczyk, Julie McHugh, Scott Habig, Tony Vernon Dominic Caruso re (Updated) Remicade Price Increase Memo with attachments	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
330		11/30/00	Letter to All Orth Biotech Employees transmitting the Ortho Biotech "Best Practice Guidelines"	No objection	
331	MDL-OBI0006183 1-41	10/3/97	Procrit Reimbursement Alternatives Presented by Documedics	No objection	
332	MDL-OBI0006134 6-526	10/23/97	JJHCS Regional Managed Care Training	No objection	
333	MDL-OBI0006169 2-93	11/6/97	Bulleting No. 17 to Orlando Team from Brian Butler re: President's Cup Strategy Meeting Recap	No objection	
334	MDL-OBI0000677 7-817	12/00/99	Strategies for Shaping the Reimbursement Environment	Hearsay	J&J
335		4/28/06	Declaration of Mark E. Duxbury	Hearsay FRE 403 Lacks Personal Knowledge No Opportunity to Cross Examine Improper Lay Opinion	J&J
336			POA I Oncology Account Specific Contracting Pre-Work	Not properly authenticated/ lacks proper foundation FRE 403	J&J
337	MDL-OBI0006355 2-56		Strategic Plan Worksheet	No objection	
338	MDL-OBI0005288 3-931	11/00/02	Current Strategies – Discussion Document	Illegible MDL-OBI00052887, 52889, 52893, 52900, 52908, 52915, 52922	J&J
339	MDL-OBI0006180 3-07	8/6/96	Memorandum from C. Dooley to T. Amick re: Reimbursement Considerations for Spillover Planning	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
340	MDL- OBI0003734 5	3/28/97	Letter from Rick Heine to A. Sample, M.D.	No objection	
341	MDL- OMP004946 4		Contract Terms Comparison Procrit vs Aranesp	No objection	
342	MDL- OBI0005391 1-75	6/12/02	Draft Procrit Contracting: Strategic Response to Aranesp – Working Session	No objection	
343	MDL- OBI0004145 7-79	9/18/02	Procrit Physician Office Strategy: Strategic Responses to Aranesp prepared by Charles River Associates	No objection	
344		8/5/02	Procrit Contracting: Modeling Provider Economics prepared by Charles River Associates	No objection	
345	MDL- OBI0005968 8-89	8/19/98	Physician Office Rebate Scenarios	No objection	
346	MDL- OBI0006085 9-64	2/8/99	Procrit Medicare Review prepared by Trinity Partners	No objection	
347	MDL- OBI0005932 9-41	12/15/98	Procrit Medicare Review prepared by Trinity Partners	No objection	
348	MDL- OBI0005592 9	8/10/00	Document titled Ortho Biotech Historical List Price Change Procrit	No objection	
349	MDL- OBI0003830 6	8/8/02	Document titled Ortho Biotech Products, L.P. Historical Pricing Actions	No objection	
350	MDL- OBI0001540 6	Undated	Chart titled Practice Economics – Detail of Calculations, List Price Changes, No Rebates	No objection	
351	MDL- OBI0003842 5-426	Undated	Document titled Buy/Bill Physicians and APC	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
352	MDL- OBI0004148 0-482	Undated	Documents/charts titled Physician contracting current status, Managed Care Contracting, Managed Care Contracting	No objection	
353	MDL- OBI0005591 5-916	Undated	Document titled Ortho Biotech Products, L.P. Medicare Reimbursement Analysis re Procrit	No objection	
354	MDL- OBI0005407 6-081	Undated	Document titled Current 7% Total Rebate (5% physician rebate + 2% administration fee) Proposed Rebates	No objection	
355	MDL- OBI0001531 1-312	11/7/00	Memorandum from John Dempsey to Gary Reedy, Bill Pearson re Price Increase – PRO's & CON's	No objection	
356	MDL- OBI0006081 8-822	6/19/98	Memorandum from M. Reese to B. Pearson re Proposed Rebates	No objection	
357	MDL- OBI0000367 1-824	1/26/00	Ortho Biotech document titled Project PROBIT Final Report	Hearsay	J&J
358	MDL- OBI0000283 3	Undated	Documents titled Ortho Biotech Products, L.P. – Price Increase/Change	No objection	
359	MDL- OBI0000451 5-517	8/16/99	Redbook document titled Product Listing Verification Medical Economics	No objection	
360	MDL- OBI0005653 4-35	11/13/00	Memo from First Data Bank to Martha Hull re products included in databank	No objection	
361	MDL- OBI0000283 5	9/01	Memo to All Wholesalers And Distributors re URGENT – PRICE CHANGE NOTIFICATION	No objection	
362	MDL- OBI0006364 2-643	Undated	Document titled Physician Economic Eimpact: Procrit vs. Transfusions	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
363	MDL- OBI0005897 9-82	9/28/98	Document titled Objection Workshop	No objection	
364	MDL- OBI0005916 4	9/28/98	Letter from Brock Weathers to Michael Kalson of Academy Orthopaedics attached	No objection	
365	MDL- OBI0006178 5	4/3/97	Memorandum from M. Klein/ C. Dooley to S. Salmon	No objection	
366	MDL- OBI0006310 0	8/00	"POA3" Training (Video)	No objection	
367	MDL- OBI0005464 7		Procrit (Epotein alfa): The Strength of Experience	No objection	
368	MDL- OBI0005465 0		Maximum Value Programs for Preferred Physician Customers	No objection	
369			Maximum Value Programs for Preferred Hospital Customers	No objection	
370	MDL- OBI0005465 9	2002	Procrit-CA-R 1.2CD-Rom: The Procrit vs. NESP Cost Analysis Presentation-R	No objection	
371	MDL- JJ0000060- 61	9/20/06	Email from Diane Ortiz re: AWP Reporting Issue: An Overview	No objection	
372	MDL- CEN000648 85-94	3/19/03	Memorandum to Christine Poon & Bill Weldon from Joe Scodari re: Centocor Price Recommendation – April 7, 2003	No objection	
373	MDL- CEN000697 47-50	7/12/02	Email from Kathy Buto re: Updated Slides for July 16 Meeting	No objection	
374			NOT USED		
375	FDB-AWP 03929-932	12/3/01	Mailgram to Customer from Frank Dilascia	FRE 403	SP/W
376	WCT002398 1			FRE 403	SP/W
377	WCT001207 3	9/21/95	Letter to Bill Folk from Jerome Sherman	FRE 403	SP/W
378	SPF0057742		Letter from Frank Dilascia	Relevance	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
379	SW0173547	11/18/97	Letter from Harvey Weintraub to Jacob Blatt	FRE 403	SP/W
380	WAR0020649	10/9/98	Price Change	FRE 403	SP/W
381	SPF00013329-31	3/19/01	Email exchange between Olav Hellebo and Peter McCarthy	FRE 403	SP/W
382	SPF0116590-91	9/29/00	Email from Susan Lund to George Paliotto	Relevance FRE 403	SP/W
383	SPW0039329	12/11/95	Memorandum to R. Bucko from D. Reich re: Warrick Inhaler Invoicing	FRE 403	SP/W
384			Schering-Plough Annual Spreads 1991 to 2004 Q1	Relevance Hearsay Daubert	SP/W
385	SPF0115322-27	8/16/00	E-mail from Kathleen Taylor to Bonnie Zell	Relevance	SP/W
386	SPF0114601-05	6/20/00	E-mail from Susan Lund to Patricia Grote re: Reimbursement Letter	Relevance	SP/W
387	SPF0117637-38	11/3/00	E-mail from Tomas Manos to Cynthia McGuiness	Relevance	SP/W
388	SPF0118419-26	1/4/01	E-mail from Denise Foy to Ray Russo re: Revised Q&A for Genentech Announcement	Relevance	SP/W
389	SPF0105089-92	7/27/98	E-mail from Frances Deangelo-Lynch to Bruce Wallace re: Kaiser Files	Relevance	SP/W
390	SPW0042546		Schering Integrilin Committed Member Program – Letter of Commitment	Relevance	SP/W
391	SPF0119115-16	7/2/01	E-mail from Janice Brennan to Alberto Sanabria re: New Integrilin NDPs and AWP	Relevance	SP/W
392	SPF0113276-300		E-mail from Susan Lund to George Paliotto re: Current Reimbursement Status of 3b/3a Class	FRE 403 Hearsay	SP/W
393	SPF0074932-35	8/19/99	E-mail from Gary Galvan to Peter Kamins re: Temodar	FRE 403	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
394	SPF0104510-12	2/2/98	E-mail from David Maya re: Intron 95% AWP Reimbursement for Bladder	Relevance	SP/W
395	SPW0042545		Schering Intron Committed Member Program – Letter of Commitment	FRE 403	SP/W
396	WAR0006979-82		CVS Proposal	FRE 403 Incomplete	SP/W
397	SW0027026		Schering document titled “Cost Analysis for Superficial Bladder Cancer”	Relevance	SP/W
398	WAR 0065610-13	4/29/03	Letter to Michelle Sylvestre from B. Michael Kennedy re: Schering Corporation Pricing	No objection	
399	SPF0104512		Intron A for Superficial Bladder Carcinoma	Relevance Incomplete	SP/W
400	SPW0039766-836		Schering Laboratories Generic Strategy	FRE 403	SP/W
401	WAR0065608-09	4/3/03	Letter from B. Michael Kennedy to David Parella with Warrick Pharmaceuticals Pricing Update for the month ending 03/31/03	No objection	
402	SPW0039331-34	4/14/97	“Rider To Terms Of The Bid” between Warrick Pharmaceuticals and Jack Eckerd Corporation	Relevance	SP/W
FRE 403	FDB-AWP 03988-90	11/11/00	Fax from Peter Kamins to Ina at First Databank with Western Union Mailgram from Frank J. Dilascia to Peter Kamins re: price increases	FRE 403	SP/W
404	WAR0000511		Document titled “Amerisource Income Rx and Select Market Share Programs”	FRE 403	SP/W
405	SW0638402-545		Schering-Plough Organizational Chart	Relevance	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
406		8/29/06	Press Release "Schering to Pay \$435 Million for The Improper Marketing of Drugs and Medicaid Fraud"	Relevance Hearsay	SP/W
407	SW0638402-595	4/1/00	April 1, 2000 Schering-Plough International Organization Chart of employees	FRE 403	SP/W
408	WAR000599 3-6097		Schering Laboratories Generic Strategy	FRE 403	SP/W
409	WAR000595 7-77	4/21/93	Proventil Inhaler Generics Strategies	Relevance	SP/W
410	SPW003967 2-74	1/4/93	Schering Laboratories Memo from Eugene P. Desimone and Richard W. Zahn to Raul E. Cesan re: Strategic Issues	Relevance Lack of Foundation	SP/W
411	WAR004607 1-72	5/10/95	Schering Labs Managed Care Memo from Beth Voss to Betsy Chorpenning re: Proposal for Suncare, Warrick and Vancenase aerosol at DEMAC/SelectCare	FRE 403	SP/W
412	WCT014553 6	6/13/00	Warrick Pharmaceuticals Memo from Harvey Weintraub to Raman Kapur re: Discontinuance of Private Label Product	Relevance	SP/W
413	WCT014550 4	2/6/01	Schering Laboratories Letter from Michael Marino to Don McGeorge and Mike Schlotman re: Return Policy	Relevance	SP/W
414	WCT000171 3-16	6/24/94	Revised Schering Laboratories Slides re: Proventil Inhaler	Relevance	SP/W
415	SW0641705-06	3/23/99	Warrick Memo from Darren K. Willoughby to Raman Kapur re: Updated Managed Care Pricing	FRE 403	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
416	SPW003983 7-38		Integration of Warrick into Managed Care summary of review of mission and action plan	FRE 403 Lack of Foundation	SP/W
417	SW0024512 7-30	10/20/99	Extraneous Costs Associated with Warrick Albuterol Discontinuation from Richard Zahn	Relevance	SP/W
418	WCT014492 4-28	3/29/94	Schering Managed Care Memo from David Lee to Scott Larson re: GeriMed Warrick Contract Proposal	Relevance Lack of Foundation	SP/W
419	WAR000166 1	12/7/95	Warrick Sales Meeting Agenda	FRE 403	SP/W
420	SW0647978- 8033		Contracting Guide	Relevance	
421	WCT003178 6-90	8/9/93	Schering Laboratories Memo Harvey Weintraub to Richard Zahn re: Status Report – Warrick Pharmaceuticals	FRE 403 Lack of Foundation	SP/W
422	WAR004314 1-48; WAR004312 4	2/2/95	Warrick Letter to Burt Orland Director of Pharmacy for Fallon re: contract price effective March 1, 1995 through December 31, 1995; and October 28, 1999 email from Patty Burke to Kathleen Flynn re: Fallon Clinic – Albuterol	No objection	
423	SW0425368- 70	5/13/02	Email from Michael Flinn to Paul Ehrlich re: Impact of Changing Medicaid Basic Rebate Minimum with Schedule Attached	Relevance	SP/W
424	WAR005401 8; SPF0045824 -26	2/8/99; 2/16/99	E-mail from Frank Finnie re: Albuterol Inhaler Back-Order Status; and E-mail Penny Malcolm to Rosanna Dooley re: CMOP Shipments for Proventil Inhalers	Relevance	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
425	WAR000615 5-56	6/21/00	Letter from John F. Hoffman to L. Timothy Terry	No objection	
426	SPF0057682	1/8/02	E-mail from B. Michael Kennedy to John Vanschaften re: Price Reporting	Relevance	SP/W
427	WCT000262 2	12/29/95	Warrick letter from Phyllis T. Sinoradzki to Sharon Milton-Wilhelm re: Albuterol pricing	Relevance	SP/W
428	WCT001213 6	12/30/95	Warrick letter from Phyllis T. Sinoradzki to Elizabeth Geary re: Albuterol pricing	Relevance	SP/W
429	WCT001181 6	12/30/95	Warrick letter from Phyllis T. Sinoradzki to Martha McNeill re: Albuterol pricing	Relevance	SP/W
430	WAR000143 4-41	1/3/96	Schering-Plough Memo from Mark Calabrese, Carolyn Heintz Kocis and Kevin Cavanagh to Managed Care Directors and MCAMs re: Proventil Inhaler/Albuterol Generic Managed Care Action Plan	FRE 403 Lack of Foundation	SP/W
431	WAR002242 9	2/23/95	Warrick letter from Harvey J. Weintraub to Warrick Accounts re: Albuterol price increase	FRE 403 Lack of Foundation	SP/W
432	WAR002966 1	5/15/98	Schering-Plough Memo from B. Michael Kennedy to Raman Kapur re: Rite-Aid Chargeback Program	FRE 403	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
433	WAR001511 4; WAR001507 1; WAR001514 3-44; WAR001516 7; WAR001518 9-90; WAR001500 9-10		Rite-Aid Corporation Secret Pricing	FRE 403 Incomplete	SP/W
434	WAR000700 1-02		Rite-Aid Pricing	FRE 403	SP/W
435	WCT014530 1-06	11/30/98	Warrick letter from Jerome A. Sherman to Irwin Wechsler re: ISMN tablet pricing	FRE 403	SP/W
436	WAR002540 5	6/6/95	Warrick letter from Jerome A. Sherman to John Ziebell re: Inhalation Solution and Syrup	FRE 403	SP/W
437	WAR002152 9-30	9/21/95	Warrick letter from Al Graf to John Ziebell re: Albuterol Price Increase	FRE 403	SP/W
438	WAR002149 8	5/8/96	Memo from Patty Hiley to Yvonne Cagnina re: Walgreen Company Credit, Line Rebate 1st Quarter 1996	FRE 403	SP/W
439	WAR002520 1	2/25/98	Letter Al Graf to John Ziebell re: Albuterol Price and Rebate Change	Relevance	SP/W
440	WAR002064 3	5/5/98	Warrick Promotion Agreement with Walgreen	FRE 403 Incomplete	SP/W
441	WAR000671 9-22	5/7/98	Warrick memo Al Graf to Raman Kapur re: Walgreen's Free Goods	FRE 403	SP/W
442	WAR002520 2	5/22/98	Letter Al Graf to John Ziebell re: Albuterol Price Change	Relevance	SP/W
443	WAR002519 5	10/9/98	Letter Al Graf to John Ziebell re: Albuterol Price Change	FRE 403	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
444	WAR0025180	3/11/99	Letter Al Graf to John Ziebell re: Albuterol Price Change	Relevance	SP/W
445	WAR0025174	9/22/99	Letter Al Graf to John Ziebell re: Albuterol Sulfate Price Change	FRE 403	SP/W
446	WAR0025170	11/11/99	Letter Al Graf to John Ziebell re: Albuterol Price Change	Relevance	SP/W
447	WAR0016695	5/30/96	CVS/Warrick Inhaler Market Share Program	FRE 403 Lack of Foundation	SP/W
448	WAR0016668	11/20/96	Fax Jerome Sherman to Jackie Mobley re: Market Share Program	FRE 403 Lack of Foundation	SP/W
449	SPW0042103-04	1/29/97	Letter Penny Malcolm to Anthony Tavolaro re: Chargeback Rebate	FRE 403	SP/W
450	WAR0011799	2/18/97	Letter Jerome Sherman to Anthony Tavolaro re: Albuterol Sulfate Price Change	FRE 403	SP/W
451	WAR0011637-38	3/24/97	Letter Anthony Tavolaro to Jerome Sherman re: Generics	Relevance Hearsay	SP/W
452	WAR0011812	3/27/97	Letter Jerome Sherman to Anthony Tavolaro re: Albuterol Price Change	Relevance Lack of Foundation	SP/W
453	SW0736211-17	6/10/97	Warrick Fax re: Total Line Rebate Program	FRE 403	SP/W
454	WAR0011811	9/9/97	Warrick letter Jerome Sherman to Anthony Tavolaro re: Albuterol Price Change	Relevance Lack of Foundation	SP/W
455	WAR0011800	9/9/97	Warrick letter Jerome Sherman to Anthony Tavolaro re: Albuterol Sulfate Price Change	FRE 403	SP/W
456	SPW0042077-82	10/27/97	Warrick letter to Anthony Tavolaro re: Total Line Rebate Program	FRE 403	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
457	WAR000645 5-56	5/5/98	Warrick letter Jerome Sherman to Anthony Tavolaro re: Albuterol Price Change	Relevance	SP/W
458	WAR000644 9-50	10/16/98	Warrick letter Jerome Sherman to Kate Shattuck re: Albuterol Price and Rebate Change	Relevance	SP/W
459	WAR000645 1-52	10/28/98	Warrick letter Jerome Sherman to Kate Shattuck re: Albuterol Price and Rebate Change	Relevance	SP/W
460	WAR000643 1	1/18/99	Warrick letter Jerome Sherman to Matt Leonard re: Albuterol Price Change	Relevance	SP/W
461	WAR000253 3	4/12/99	Warrick Memo Jerome Sherman to Raman Kapur re: Rite Aid/CVS – Wholesaler Chargebacks	FRE 403	SP/W
462	WAR002060 9-10	6/21/99	Warrick Fax to Matthew Leonard re: completely executed copy of the Total Line Rebate Agreement	FRE 403	SP/W
463	WAR000642 4; WAR000642 6	9/14/99	Warrick letter Jerome Sherman to Matt Leonard re: Albuterol Sulfate Price Change	FRE 403	SP/W
464	WAR000642 7	9/14/99	Warrick Account Information Form for Price Change to CVS	Relevance	SP/W
465	WAR000635 3	3/22/00	Warrick letter Jerome Sherman to Matt Leonard re: Albuterol Price Change	Relevance	SP/W
466	WAR003070 8-11	11/30/00	Warrick letter to David Marshall re: Chargeback Rebate	FRE 403	SP/W
467	WAR000697 9-82; WAR002028 3-86		CVS Proposal	FRE 403 Incomplete	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
468	WAR000633 6-37	7/5/00	Warrick Memo Jerome Sherman to Ruth Olivares re: CVS- Meeting Ethex Offer with Warrick Promotion Agreement	FRE 403	SP/W
469	WAR003785 1-52	1/8/01	Warrick Promotion Agreement with Merck-Medco	Relevance Lack of Foundation	SP/W
470	WAR003680 7-09	1/16/96	Schering-Plough Fax Richard Zahn to Raman Kapur re: Medco Proposal	FRE 403 Lack of Foundation	SP/W
471	WAR000151 0-27		Schering/Warrick Albuterol Inhaler Action Plan, prepared by Steve Cooper and Mark Calabrese	No objection	
472	WCT000103 2	1/4/95	Warrick Memo Steve Cooper to Raman Kapur re: Notes from Trade Sales/Warrick Staff Meeting	FRE 403	SP/W
473	SPW003933 6	7/11/97	Schering Corporation Guarantees re: ANDA Generics	Relevance	SP/W
474		3/15/93	Certificate of Incorporation of Warrick Pharmaceuticals Corporation issued by Delaware Secretary of State	Relevance	SP/W
475		2/22/94	State of Delaware 1993 Annual Franchise Tax Report for Warrick	Relevance	SP/W
476		2/23/95	State of Delaware 1994 Annual Franchise Tax Report for Warrick	Relevance	SP/W
477		2/15/96	State of Delaware 1995 Annual Franchise Tax Report for Warrick	Relevance	SP/W
478		2/21/97	State of Delaware 1996 Annual Franchise Tax Report for Warrick	Relevance	SP/W
479		2/24/98	State of Delaware 1997 Annual Franchise Tax Report for Warrick	Relevance	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
480		2/17/99	State of Delaware 1998 Annual Franchise Tax Report for Warrick	Relevance	SP/W
481		2/21/00	State of Delaware 1999 Annual Franchise Tax Report for Warrick	Relevance	SP/W
482		2/21/01	State of Delaware 2000 Annual Franchise Tax Report for Warrick	Relevance	SP/W
483		2/21/02	State of Delaware 2001 Annual Franchise Tax Report for Warrick	Relevance	SP/W
484		2/26/03	State of Delaware 2002 Annual Franchise Tax Report for Warrick	Relevance	SP/W
485		2/3/04	State of Delaware 2003 Annual Franchise Tax Report for Warrick	Relevance	SP/W
486		2/23/05	State of Delaware 2004 Annual Franchise Tax Report for Warrick	Relevance	SP/W
487	WCT014532 0-37	3/22/02	Schering Corporation Contracts & Pricing fax Kevin Kendell to Raman Kapur re: 1993 Master and Pharmaceutical Pricing Agreements for Secretary of Veterans Affairs and Warrick	Relevance	SP/W
488	WCT003165 5-56	2/3/99	Memo F. Finnie to J. Caso re: Albuterol Inhaler Back-Order	FRE 403	SP/W
489	SPF0084011 -14	2/3/00	Email John Vanschaften to Mark Nolan, Kathleen Flynn, Serafina Oxner and Darren Ray re: Warrick Managed Price List – 1/01/00	FRE 403	SP/W
490	WAR004438 6	8/23/99	Warrick Managed Care Pricing	FRE 403	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
491		7/16/04	Warrick letter Janice Brennan to David Parrella re: Warrick Pricing Update for the Month Ending 6/30/04	Relevance	SP/W
492	SPF0241686	5/5/00	E-mail Debbie Kane to Greg Birch and others re: Price Alert!	No objection	
493	SW0466235-36; SPF0222662	7/19-20/00; 7/19/00	Schering Corporation e-mails Janice Brennan to Mike Walsh and Dan Harkins re: AWP Price List Distributions; Schering Corporation e-mails between Janice Brennan and Karen Yutsus re: Req's for Price Lists	No objection	
494	WCT014506 6-67	9/3/93	Warrick letter Harvey Weintraub to Karen Green re: New Albuterol Sulfate Package Size	FRE 403	SP/W
495	WCT014480 9	10/12/93	Warrick letter Harvey Weintraub to Don Rodriguez re: Albuterol Sulfate Price Change	FRE 403	SP/W
496	SPF0084328 -33	8/14/00	Warrick email Dan Valerio to Harvey Weintraub re: Redbook Omissions Letter to Linda Panke	FRE 403	SP/W
497	SPF0001739 4-95	12/10/02	E-mail Brian Longstreet to Olav Hellebo among others re: Rebeto/Ribavirin Retail Pharmacy Strategy	Relevance	SP/W
498	WCT000087 9	9/8/99	Letter Bindley Western's Christopher Worrell to Warrick's Al Graf re: manipulation of pricing	Relevance Hearsay Lack of Foundation	SP/W
499	WCT000128 5-96		PowerPoint Slides re: Rebates	FRE 403	SP/W
500	WCT000129 7-302	10/1/96	Warrick Market Share Rebate Documentation – Rebates – Procedural Guidelines	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
501	SW0398802-05	2/13/02	Warrick Rebate Programs	FRE 403	SP/W
502	SPF0088047-48	7/9/02	E-mail Lilly Kritou to Brian Block and others re: Warrick Rebate Programs	FRE 403	SP/W
503	WCT0012823-24		Warrick Individual Prices and Promotion	FRE 403	SP/W
504	WCT0001278-80	5/15/98	Warrick Trade Rebates – Generic Division PowerPoint Presentation by Jackie Mobley	FRE 403	SP/W
505	WAR0072317-36		Free Goods Summary	FRE 403 Lack of Foundation	SP/W
506	WCT0145547	3/31/00	Warrick and Schering TRAM Enhancement Requirements re: Market Share Rebate Claims	FRE 403	SP/W
507	WCT0145245-48	12/12/94	Warrick letter Walter Gough to Jerry Kern re: Total Line Rebate Program	FRE 403	SP/W
508	WCT0145176-7	12/10/93	Warrick Proposal with Walgreen	FRE 403	SP/W
509	WCT0145178	1/3/96	Warrick letter Jerome Sherman to Bob Breetz re: Albuterol Program	FRE 403	SP/W
510	WCT0145169-72	8/4/94	Warrick letter Walter Gough to Paul Beahm re: Total Line Rebate Program	FRE 403	SP/W
511	WCT0145316-19	6/24/99	Fax Eckerd's Beatrice Vines to Warrick's Paul Thompson re: Executed Total Line Rebate Agreement	FRE 403	SP/W
512	SPW0042107-08	8/7/96	Warrick letter Penny Malcolm to Anthony Tavolaro re: Rebate Program	FRE 403	SP/W
513	SPW0042105-06	10/31/96	Warrick letter Penny Malcolm to Anthony Tavolaro re: Rebate Program	FRE 403	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
514	SPW004209 9-100	4/25/97	Warrick letter Penny Malcolm to Anthony Tavolaro re: Rebate Program	FRE 403	SP/W
515	WAR000633 0-31	4/7/94	Warrick Albuterol Agreement Terms Schering Sales Accounts	No objection	
516	WAR000612 3-27	7/8/93	Schering-Plough Memo L. Weiss to Distribution re: draft news release on Warrick	Relevance Lack of Foundation	SP/W
517	WAR000124 9		Reduction of Medicaid Through Use of Generics	Relevance Incomplete	SP/W
518	WAR000000 1-13	4/1/97	Schering-Plough Organization Chart	FRE 403	SP/W
519	WCT016393 9	8/6/93	Contracts & Information Memo Betsy Chorpenning to Richard Zahn re: Warrick Products	Relevance	SP/W
520	SPW004209 1-93	7/7/00	CFI NJ/Central Fill Application for Generic Contract Award Proposal signed by Michael Kennedy	Hearsay Incomplete	SP/W
521	WAR000142 2-23	11/12/96	Contracts and Pricing Memo Kimberly Timko to Linda Zhou re: Rebate Impact of BP Changes	Relevance	SP/W
522	SPF0002274 6	10/11/02	Schering Labs Memo from Richard Zahn re: Pricing SOPs	FRE 403	SP/W
523	WCT000167 9-87	12/7/00	Best Price, Medicaid Rebates and Nominal Pricing prepared by Michael Flinn	Relevance	SP/W
524	SW0098712		Pricing definition from Schering-Plough Manual defines Net Direct AWP	Incomplete	SP/W
525	SPF0077834 -36	7/18/02	E-mail Michael Walsh and others re: Field Trade Account Alignment	FRE 403	SP/W
526	SW0159246- 69	7/1/99	Warrick Trade Rebate Claims Log	FRE 403	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
527	SW0159275-304	8/9/99	Warrick Memo Jesse Mensah to Michael Kennedy re: 1999 Trade Rebate Claims	FRE 403	SP/W
528	SW0159402-51	12/7/99	Warrick Memo Jesse Mensah to Michael Kennedy re: 1999 Trade Rebate Claims	FRE 403	SP/W
529	WCT014553 7-41	5/24/00	Combined Schering-Plough Report on Warrick/Generic and Brands	Relevance	SP/W
530	WCT014508 9-90		1998 Schering Division Standard Approval Notice includes Schering-Plough and Warrick signoff	FRE 403	SP/W
531	WCT014514 7	1/10/96	Warrick letter Jerome Sherman to Betty Swansinger of Discount Drug Mart re: Proventil Market Share Program, Rebate Programs, and other off-invoice discounts	FRE 403	SP/W
532	SPF0329424 -29	1/3/02	E-mail John Vanschaften to Michael Kennedy and Harvey Weintraub re: Warrick Monthly Price Reporting to All States Medicaid and Formulary Offices	No objection	
533	WAR000138 4-87	5/14/99	Trade Financial Services Memo from M. Nolan re: 1991-1 Medicaid Best Price Changes for Schering and Warrick Products	Relevance	SP/W
534	WCT006994 3-45	5/17/01	TMS Pricing on Warrick AWPiDs	Relevance Hearsay Incomplete	SP/W
535	WTT014647 8-81	8/6/99	Warrick Telemarketing Sales Records for 1999	FRE 403 Hearsay	SP/W
536	WAR000674 5-48	3/6/97	Warrick letter Louis Manfredi to Thelma Underwood of Arkansas Medicaid enclosing Product Line Report	Relevance	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
537	WAR007135 4-55	6/18/03	Schering-Plough email Michaela Lukanski to Louisiana and others re: LAM Offer Form	Relevance	SP/W
538	SW0325880- 81	4/27/98	Memo R. Doliveux to Raul Cesan re: Respiratory Risk Share Proposal and ITG	Relevance	SP/W
539	SW0425013- 14	2/22/99	Memo Richard Zahn to Raul Cesan re: Cigna Contract Proposal	Relevance	SP/W
540	SPF0030451 -54		Schering Labs Memo Greg Birch and Debbie Kane to Richard Zahn re: Medicare Analysis	No objection	
541	SW0024555 6-67		Chain Store Initiatives	Relevance	SP/W
542	SW0587249- 62	7/11/97	Memorandum from Joann Androconis to Greg Novell re: Proventil HFA Backgrounder	Relevance	SP/W
543	SPW003245 6-622		Warrick Pharmaceuticals Policy and Procedure Manual	No objection	
544	SW0723861- 68		1998 Schering Plough 1998 Goals Report-Strategic	Relevance	SP/W
545	SW0723936- 57		1999 Schering Plough 1999 Goals Report	Relevance	SP/W
546	SW0723124- 59		1998 Schering Plough Goals Report- 1998 Operating Plan-Financial	Relevance	SP/W
547	SW0723160- 188		1997 Schering Plough 1997 Goals Report-1997 Operating Plan	Relevance	SP/W
548	SW0721087	4/16/03	Message from Lisa Davis to Glyndon Kennerly re: CTRA does not state payments for suits.	Relevance	SP/W
549	SW0721089- 90	1/15/03	Email from Lisa Davis to Karen Klemm, Marilyn Davis re: Check Request Question	Relevance	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
550	SW0721179-82	1/7/03	Check Requests from Schering Plough to Steven O'Day of John Wayne Cancer Institute re Intron A testing.	Relevance	SP/W
551	SW0721230-35		ECAP 2003 Projected Payments (2003 Mo. Trial Bgts)	Relevance	SP/W
552	SW0721236-8		ECAP 2003 TIMS Report 2003 Estimates	Relevance	SP/W
553	SW0722507-13	9/29/99	Email chain and attached Net Direct Price List from Christine Baker to Joan Crout re: Net Direct Price/ Brief Product Description List (price increase Integrilin)	FRE 403	SP/W
554	SW0707098-102		Temodar Sales Report	FRE 403	SP/W
555	SW0707085-9		Intron Sales Report	FRE 403	SP/W
556	SW0580581-6	6/14/00	Letter and attachments from James Conti Schering Plough) to Robin Zeal (Prescription Solutions) re: 2.5 million rebate for the 1998 through 1999 settlement.	Relevance	SP/W
557		8/29/06	Complaint United States v. Schering Sales Corporation 06-cr-10250	Relevance Hearsay	SP/W
558		8/24/06	Letter from Michael J. Sullivan (US Attorney, District of Massachusetts) to Brien T. O'Connor (Ropes & Gray) re: United States v. Schering Sales Corporation Settlement Agreement	Relevance Hearsay	SP/W
559		8/24/06	Settlement Agreement between United States of American and Schering Plough Corporation	Relevance Hearsay	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
560		8/25/06	Addendum to Corporate Integrity Agreement Between the Office of Inspector General of the Department of Health and Human Services and Schering-Plough Corporation	Relevance Hearsay	SP/W
561		8/24/06	Letter from Michael J. Sullivan (US Attorney, District of Massachusetts) to Brien T. O'Connor (Ropes & Gray) re: Side Letter Agreement with Schering Plough Corporation	Relevance Hearsay	SP/W
562		8/29/06	Press Release re: Schering to Pay \$435 Million for the Improper Marketing of Drugs and Medicaid Fraud	Relevance Hearsay	SP/W
563	SPF0254288-444	5/7/01	Email and attachments from Penny Malcom to Christian Nazar, Ronald Martin, Michael Walsh, Peter Kamins, Ronald Martino, Gary Gavan, and Frank Diascia re: Proventil HFA/Lotrisone Lotion Rebate	Relevance	SP/W
564	SPF0254445-53	5/7/01	Email and attachments from Penny Malcom to Frank Dilascia, Peter Kamins, Ronald Martin, Ronald Marino, Charles McDonald, Galvan Charles, Christian Nazar, and Michael Walsh re: Rebate Program	Relevance	SP/W
565	SW0579097-103		Business Rationale for ITG I.T. Reengineering Investment	Relevance	SP/W
566	SW0578838-82		Overview of Disease Management Program	Relevance Lack of foundation	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
567	SW0578773-6	5/14/98	Schering Plough Account Proposal for Prescription Solutions	Relevance	SP/W
568	SW0578539-42	10/21/99	Schering Plough Memorandum from Roch Doliveux and Len Camarda re: Managed Care/Health Management Organization	Relevance	SP/W
569	SW0578756-7	6/23/99	Memorandum from Rich Zahn to Raul E. Cesan re: Protect and Grow Strategy for Foundation Health Systems	Relevance	SP/W
570	SW0579194 9-81	3/29/00	Roch Doliveux Interview re: Rebates	Relevance Hearsay	SP/W
571	WCT101454 76	5/31/01	Memorandum from Harvey Weintraub to Mr. R. Cesan re: Albuterol Inhaler-Price Change Recommendation	No objection	
572	SPF0001723 8-79	12/13/01	Email and attachment from Keith McCormick to Brian Longstreet re: Grants 2000-2001	FRE 403	SP/W
573	SPF0002274 5-46	11/2/01	Schering Plough Memorandum from Richard Zahn to Steve Andrzejewski, Joe Caso, Anne Fields, Bill Heiden, and Jim Mackey re: Product Pricing	No objection	
574	SW0724651-54	4/20/00	Letter from B. Michael Kennedy to Mr. William Shrigley re: Sales made by Schering Plough to drug repackagers and relabelers	Relevance	SP/W
575	WAR007296 2-88		Spreadsheet Schering-Plough and Warrick Pharmaceuticals	FRE 403	SP/W
576	SW0676381		Agreement between Schering Corporation and TDI Managed Care Services, Inc.	FRE 403 Incomplete	SP/W
577	SW0674485-95	8/98	Medicaid Drug Rebate Operational Training Guide	Relevance Hearsay	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
578	SW0689920-23		OBI Reallocation	Relevance	SP/W
579	SW0674027-39		S-P Managed Care/ITG Transform MCOs Into Advocates Creative Contracting	Relevance	SP/W
580	SW0741559-80		Managed Care Memorandum/Proventil	Relevance	SP/W
581	WAR005587 7-81	5/5/00	Letter from Tom Bliley (US House of Representatives Committee on Commerce) to Mr. Raman Kapur Warrick) re: Pricing practices for Medicare pharmaceuticals	Relevance Hearsay	SP/W
582	WAR005587 5-6	10/18/99	Letter from Tom Bliley (US House of Representatives Committee on Commerce) to Mr. Richard Kogan Schering Plough) re: how Schering Plough calculates AWP for Albuterol sulfate	Relevance Hearsay	SP/W
583	WAR005587 1-4	7/19/99	Letter from Tom Bliley (US House of Representatives Committee on Commerce) to Mr. Raman Kapur Warrick) Re inquiry into establishing prices for the Medicare reimbursements	Relevance Hearsay	SP/W
584	WAR000258 1-82		Main Frame systems instructions for Reflections	Relevance	SP/W
585	WAR000251 6-17		Total Line Rebate Procedure	FRE 403	SP/W
586	WAR000251 2-13		Bill Back rebate instructions	FRE 403	SP/W
587	WAR000631 4-20	6/21/96	Memo and attached minutes from L. Manfredi to Distribution re: Sales Directors Meeting June 17/18, 1996	FRE 403	SP/W
588	SPF0045734 -79	8/28/00	Slide Show by Bruce Wallace re: Managed Care/Health Management	Lack of Foundation	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
589	SW0739203-10		Audit Report No. 97-105, Schering Laboratories, Wholesaler Chargeback, Amerisource Corporation, Eden Prairie, Minnesota	FRE 403	SP/W
590	SW0739077-81	2/2/00	Letter from Frank J. DiLascia to Jim Finocchi re: Schering Plough offering to A&P Supermarket Service Corporation program for the year 2000 for Proventil	FRE 403	SP/W
591	SW0739082-6	1/31/00	Letter from Frank J. DiLascia to Barrett Moravec re Schering Plough offering to ABCO Markets, Inc. program for the year 2000 for Proventil	FRE 403	SP/W
592	SW0739087-93	7/24/00	Letter from Frank J. DiLascia to Dave Vucurevich re: Schering Plough offering to Albertson, Inc. program for the year 2000 for Proventil	FRE 403	SP/W
593	SW0739094-98	7/24/00	Letter from Frank J. DiLascia to Tony Mihelich re: Schering Plough offering to American Drug Stores, Inc. program for the year 2000 for Proventil	FRE 403	SP/W
594	WAR0001301	10/25/99	Top 20 Medicaid Products 3Q99 Filing	Relevance	SP/W
595	WAR0052485-502		Slideshow by Carolyn J. McElroy re: Special Report Marketing Practices and Rebate Issues: Are They on a Collision Course?	Relevance Hearsay	SP/W
596	SW0092384-418		March, 2000 Slideshow: Legal Issues Managed Care/ Health Management National Meeting	Relevance Hearsay	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
597	WCT014534 9-66	10/1/93	Agreement between Warrick and Bi-Coastal Pharmaceuticals re: employment as sales broker	Relevance	SP/W
598	WCT014540 2-13	12/2/97	Agreement between Cardinal Health and Warrick re: authorized distributor	FRE 403	SP/W
599	WCT014542 6-30	3/1/00	Executed copies of Total Line Rebate Agreement between Warrick and Eckerd	FRE 403	SP/W
600	WAR001984 6-48		Warrick Rebates	FRE 403	SP/W
601	SPW003914 5	9/21/95	Letter from Jerome Sherman to Bill Folk re: price increase of Albuterol Sulfate	FRE 403	SP/W
602	WAR003101 1-13	12/20/00	Letter from Jesse Mensah to Bev Campbell re: Warrick Promotion Rebate	FRE 403	SP/W
603	WAR003350 9	2/16/01	Memo to Mark Ritchey from Jerome Sherman re: New Product Proposal – Oxaprozin Tablets	FRE 403	SP/W
604	SPW003917 8-88	5/8/97	Letter from Jerome Sherman to Bill Roth with attached Cardinal Health Generic Wholesale Service Agreement dated 3/1/97	FRE 403	SP/W
605	WAR000053 3-35	6/8/99;1 1/30/99	Memos to Samantha Vossenbergh from Jerome Sherman re: Price Change Albuterol, USP Inhalation Aerosol	FRE 403 Lack of Foundation	SP/W
606	SPW004215 1	10/12/93	Letter from Henry Weintraub to Beth Rader and Ed Edlestein re: price change for albuterol sulfate	FRE 403	SP/W
607	SPW003887 9	11/22/95	Memo from P. Simoradzki to C. Hagman re: price of Albuterol, USP Inhalation Aerosol	Relevance Lack of Foundation	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
608	RGX 0001195-97		Harvey Weintraub Curriculum Vitae	Relevance	SP/W
609	RGX 0001208-17	12/90	Generics – Generics Paper Managed Care by J. Audibeft (sp)	Relevance	SP/W
610	RGX 0001223	4/26/99	Warrick Account Information Form re: price change to Albuterol Solution/Syrup	FRE 403	SP/W
611	RGX 0001224	6/13/97	Warrick Account Information Form re: rebate change to Albuterol Solution/Syrup	FRE 403	SP/W
612	RGX 0001225-31	6/2/99; 3/16/99; 4/9/99; 4/22/99; 5/3/99; 7/2/99	Warrick Account Information Forms re: price change or rebate change to Albuterol Solution/Syrup	FRE 403	SP/W
613	RGX 0001232	2/23/95	Letter from Henry Weintraub to Martha McNeil re: price increase for Albuterol Solution 0.5% 20 mL	FRE 403	SP/W
614	RGX 0001233	9/22/95	Letter from Henry Weintraub to Martha McNeil re: price increase for Albuterol Sulfate, USP Solution for Inhalation 0.5% 20 mL	FRE 403	SP/W
615	WP0000276 9A	6/25/96	Warrick Promotion Agreement re: Albuterol Inhalers	FRE 403	SP/W
616	WPX000167 4-75		Handwritten notes	Lack of Foundation	SP/W
617	WP0001232 2A-24A	7/5/95	Handwritten notes re: Albuterol Solution 20 mL pricing	Lack of Foundation	SP/W
618	WP0001233 0A		Handwritten notes re: AWP	Lack of Foundation	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
619	WP0001262 9A-33A	8/11/95; 9/7/95; 9/18/95; 9/29/95; 12/4/95	Warrick Memos re: Albuterol pricing	FRE 403 Lack of Foundation	SP/W
620	WPX000767 8	12/11/95	Memo from D. Reich to R. Bucko re: Warrick Inhaler Invoicing	FRE 403	SP/W
621	RGX 0001522		Warrick Pharmaceuticals promotional piece for Albuterol	FRE 403 Lack of Foundation	SP/W
622	RGX 0001523	5/5/95	Letter from Lee Edelstein to Harvey Weintraub re: sales results for Warrick Telemarketing Team	Relevance Hearsay	SP/W
623	RGX 0001524	6/7/95	Letter from Henry Weintraub to Martha McNeill re: Cimetidine pricing	Relevance	SP/W
624	RGX 0001525-28	9/29/94	Letter from Martha McNeill to R. Kapur re: Texas Medicaid reimbursement for Perphenazine	Relevance	SP/W
625	RGX 0001529-30	11/16/95	Letter from Harvey Weintraub to Martha McNeill re: Perphenazine AWP price change	Relevance	SP/W
626	WWV00206 55-64	4/1/95 – 10/1/99	Schering-Plough Generics Organization Charts	FRE 403	SP/W
627	WWV00000 07	4/1/00	Schering-Plough Generics Organization Chart	FRE 403	SP/W
628	WWV00113 85-476		Warrick Pharmaceuticals Policy & Procedure	No objection	
629	WAR003514 9	8/11/95	Memo from Harvey Weintraub to Joseph LaRosa re: price increase for Albuterol Solution for Inhalation 20 ml	FRE 403 Lack of Foundation	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
630	SPW003783 2; SWP003768 6	12/21/95 ; 2/23/95	Letter from Harvey Weintraub to Beth Rader re: Albuterol pricing; Letter from Harvey Weintraub to Wyndy Jones re: Albuterol pricing	Relevance Lack of Foundation	SP/W
631	WAR000763 2-33	12/29/95	Letter from Harvey Weintraub to Wyndy Jones re: Albuterol pricing	Relevance	SP/W
632	WAR000763 4-35	12/29/95	Letter from Harvey Weintraub to Mukesh Mehta re: Albuterol pricing	Relevance	SP/W
633	WAR002408 6	2/23/95	Letter from Harvey Weintraub to Beth Rader re: Albuterol pricing	FRE 403	SP/W
634	WAR001601 1	3/28/96	Memo to Douglas Batezal from Walt Gough re: Albuterol Price Change	Relevance	SP/W
635	WAR001669 0	4/16/96	Memo to Anthony Tavoraro from Jerome Sherman re: Albuterol Price Change	Relevance	SP/W
636	WAR005454 5	6/11/93	Memo from frank Musat to Gary Binder re: Warrick Albuterol Pricing	No objection	
637	WAR000612 0-21	7/23/93	Memo from Harvey Weintraub to Mr. Zahn re: Warrick pricing	No objection	
638	SPW013818- 22	7/29/97; 9/21/95; 7/23/97; 9/21/95; 4/6/94	Documents between Warrick and Walgreens re: Albuterol pricing and rebates; 9/1/95 Letter from Al Graf to John Ziebell	FRE 403	SP/W
639	WAR002539 7	4/17/96	Memo to John Ziebell from Al Graf re: Albuterol Price Change	FRE 403	SP/W
640	SPW003858 5	2/99	Addendum to 10/1/98 agreement between Schering Corporation and Scott & White Prescription Services	Relevance Incomplete	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
641	SPW003858 6	2/99	Exhibit A to Addendum to 10/1/98 agreement between Schering Corporation and Scott & White Prescription Services	Relevance Incomplete	SP/W
642	SPW003858 7	2/99	Exhibit A-1 to Addendum to 10/1/98 agreement between Schering Corporation and Scott & White Prescription Services	Relevance Incomplete	SP/W
643	SPW003859 0		Document titled "Owens Healthcare Inc. Alternate Site Expiring 3/31/99	FRE 403	SP/W
644	SPW003859 1-2		Pharmacy Perspective Proventil/Albuterol	Lack of Foundation Incomplete	SP/W
645	SPW003859 3-94		Integration of Warrick Into Managed Care	Relevance	SP/W
646	SPW003859 5	4/23/96	Memo from John Stockton to Betsy Chorpenning and David Reich re: Warrick Contract for Rx America	FRE 403	SP/W
647	SPW003859 6-97	8/3/95	Memo from Patti Niehaus to Cheryl Burrell re: PCA Health Plan of FL	FRE 403	SP/W
648	SPW003851 4		Query SQL	Relevance	SP/W
649	SPW003851 5		MCR DB2 Data	Relevance Lack of Foundation	SP/W
650	SPW003851 6		Untitled Chart	Relevance	SP/W
651			SPW/AWP 2001-2004 Call Notes Sales Rep: Flynn, Mark (4 pages)	No objection	
652	WAR005451 9-28	5/20/93	Memo from Richard Zahn to Raul Cesan re: Generic Albuterol Solution/Syrup Introduction	FRE 403	SP/W
653	SW0584152- 78	6/22/99	Memo from Jim Fitzpatrick to Raul Cesan, et al. re: ITG Business Review	Relevance	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
654	SW0582348-62		Handwritten notes of Gary Binder to Roch Doliveux with attachments re: AWP	Relevance	SP/W
655	SPF0023186-93	6/21/00	E-mail from Linda Zhou to Raul Cesan re: Medco with attachments	Relevance	SP/W
656	SPW003970 0-12		Profit Optimization of Current Portfolio Proventil Inhaler	Relevance	SP/W
657	SW0648205-6	7/24/98	Memo from Richard Zahn to Raul Cesan re: Pacificare	Relevance	SP/W
658	SPW003914 6	9/21/95	Letter from Walt Gough to Douglas Batezel re: Albuterol Price Increase	FRE 403 Lack of Foundation	SP/W
659			AWP/SPW 2001-2004 Call Notes Sales Rep.: Butler, James R. (3 pages)	Relevance	SP/W
660			SPW/AWP 2001-2004 Call Notes Sales Rep: Bishop, Gary (11 pages)	Relevance	SP/W
661	SPF0112246-53	6/28/02	E-mail from Ellen Schwarzbarg to Anne Fields, et al. re: clarification of expense categories in EER with attached Spending Policy Quick Reference Guide	No objection	
662	SPW003922 8-29	12/1/01	Letter from John Van Schaften to Martha McNeill re: Warrick Pharmaceuticals Pricing Update for the Month ending 11/30/01	No objection	
663	SPW003923 0-32	11/30/01	Letter from John Van Schaften to Martha McNeill re: Warrick Pharmaceuticals Pricing Update for the Period ending 11/16/01 to 11/30/01	No objection	
664	SPW003923 3-36	2/2/00	Contact Report	Relevance	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
665	SPW003923 7-39	11/29/01	Affidavit of John Van Schaften In Opposition to Motions to Compel	No objection	
666	SPW003924 0		Letter from John Van Schaften to Martha McNeill re: Warrick Albuterol Inhalers pricing	Relevance	SP/W
667	SPW003924 1-46	2/12/97	Memo from John Van Schaften to Robert Inserra re: McKesson auto-sub charges	FRE 403	SP/W
668	SPW003924 7-50	7/9/01	Contact Report	FRE 403	SP/W
669	SPW003925 1	4/9/01	Warrick Promotional Agreement	FRE 403 Lack of Foundation	SP/W
670	SPW003925 2-55	3/20/01	Contact Report	FRE 403	SP/W
671	SPW004061 9	6/15/99	Memo to Martha Torres from Jerome Sherman re: Albuterol Price Change	FRE 403	SP/W
672	SPW004062 0	6/15/99	Memo to Martha Torres from Jerome Sherman re: Albuterol Price Change	FRE 403	SP/W
673	SPW004062 1-50		Warrick Pharmaceuticals Discount Check Promotions	FRE 403	SP/W
674	SPW004083 1	9/16/98	E-mail from John Van Schaften to Jesse Mensah re: McKesson August '98 Autosub Invoice	Relevance	SP/W
675	SPW004083 2-37		Charts re Warrick Pharmaceuticals rebates	FRE 403	SP/W
676	SPW003897 3	5/24/96	Warrick Account Information Form Albuterol USP Inhalation Aerosol price change	Relevance	SP/W
677	SPW003897 4	6/4/96	Warrick Account Information Form Albuterol USP Inhalation Aerosol price change	Relevance	SP/W
678	SPW003897 5	8/7/96	Warrick Account Information Form Albuterol USP Inhalation Aerosol price change	Relevance	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
679	SPW003897 6	8/23/96	Warrick Account Information Form Albuterol USP Inhalation Aerosol Auto Sub Program	Relevance	SP/W
680	SPW003897 7	10/14/96	Warrick Account Information Form Albuterol USP Inhalation Aerosol	Relevance	SP/W
681	SPW003897 8	12/10/96	Warrick Account Information Form Albuterol USP Inhalation Aerosol price change	Relevance	SP/W
682	SPW003897 9	4/4/97	Warrick Account Information Form Albuterol USP Inhalation Aerosol price change	Relevance	SP/W
683	SPW003898 0	10/8/97	Warrick Account Information Form Albuterol USP Inhalation Aerosol price change	Relevance	SP/W
684	SPW003898 8-89	7/31/97	Letter from Lee Edelstein to Harvey Weintraub re: Warrick Telesales	Relevance Hearsay	SP/W
685	SPW003899 2-93	4/25/01	Warrick Promotion Agreement	FRE 403	SP/W
686	SPW003899 7-9076		Telemanagement Services, Inc. – Telephone Communication Skills Training – Module 1	Relevance Hearsay	SP/W
687	SPW003965 8-70; SPW003965 6-57		Document titled “Schering\Warrick- Albuterol Inhaler-Action Plan” prepared by Steve Cooper and Mark Calabrese	Relevance	SP/W
688	SPW003967 1		Slide: Modeling Assumptions	Relevance Hearsay	SP/W
689	SPW003967 5-718	4/93	Schering Laboratories Generic Market Strategic Plan	Relevance	SP/W
690	SPW003971 9		File Folder labeled “Generics – Keys In Generic Task Force Slides”	Relevance Incomplete	SP/W
691	SPW003972 0-65		Keys In Generic Task Force Slides	Relevance	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
692	SPW003983 9-45		Untitled document	Relevance Lack of Foundation	SP/W
693	SPW003984 6-47		Pharmacy Perspective slide and MCO Perspective Slide	Relevance Lack of Foundation	SP/W
694	SPW003984 8-51		Proventil AP Launch Strategy and Transition Plan	Relevance	SP/W
695	SPW003985 2-54	10/2/95	Memo from Carolyn Kocis to Lissa Colantouno re: RGPN Committed Contract Warrick	FRE 403	SP/W
696	SPW003985 5-58	2/2/96	Memo from Carolyn Kocis to Cheryl Leone re: RGPN-Warrick Albuterol Inhaler	FRE 403	SP/W
697	SPW003986 5	6/10/93	Memo from Richard Zahn to Raul Cesan re: Albuterol Solution/Syrup Warrick Update	Relevance	SP/W
698	SPW003954 5-46	7/96	Warrick Customer Rebate Credit/Refund Checks form	Relevance	SP/W
699	SPW003956 3-64	9/20/95; 9/21/95	Letter from Jerome Sherman to James Finocchi re: Abuterol price change with fax cover	FRE 403	SP/W
700	SPW003958 0-81		Warrick Pharmaceutical Rebate Program	FRE 403	SP/W
701	SW0002244	3/4/02	March 4, 2002 Memo from Harvey Weintraub to Debbie Kane and Craig Masker	Relevance	SP/W
702	SW0301657- 72		Contract Admin. PPT.	Relevance	SP/W
703	SW0398766- 77		Schering-Plough Audit Report No. 2001-034 of Warrick	Relevance	SP/W
704	SW0398782- 94		Schering-Plough Audit Report Warrick Response	Relevance	SP/W
705			FENS 2464-0001019475 3- page Email chain re: Claims with Admin Fees based on AWP Gross Sales x 1.7%	Relevance	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
706			FENS 2464-0001034096 20-page Contracts and Pricing Rebate Administration Prelim. Assessment May 20, 1998	Relevance	SP/W
707			February 2000 Schering-Plough updated version of the "Schering Sales Corporation Policy and Procedure Manual"	No objection	
708			February 2003 (last update) Schering Sales Corporation "Sales Policy and Procedures" manual	No objection	
709	SW0154713-77	4/00/96	Schering-Plough Field Force of the Year 2000, a "how-to" manual	No objection	
710	SW0023391 4-15	6/11/02	Warrick letter Michael Kennedy to Linda Panke at Medical Economics Co. re: pricing and shipping info	FRE 403	SP/W
711	SP0012427-29	6/24/98	Schering Corporate Data Sheet	Relevance	SP/W
712	SP0012430	5/29/98	Warrick Corporate Data Sheet	Relevance	SP/W
713	RGX025585 5-76		November 2001 Getting Away from AWP: Changing Medicare and Medicaid Drug Reimbursement	Hearsay Lack of Foundation	SP/W
714	SP000939-49	10/15/92	Schering-Plough e-mail from Carolyn Kocis re: Nominal Pricing Meeting draft Executive Summary and Minutes	Relevance	SP/W
715	RGX003509 2-94	5/1/00	Warrick fax Harvey Weintraub to Richard Zahn enclosing Price Change Summary sheets re: Mylan and investigates spread	Relevance	SP/W
716	WAR006558 9-607; WAR006561 4-37; WAR006565 2-719		Various Schering/Warrick Pricing Updates	No objection	
717	WCT002234 9	9/29/95	Warrick memo Harvey Weintraub to John Hoffman re: Price Increase – Warrick Albuterol Solution 20 mL	FRE 403 Lack of Foundation	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
718	WCT013386 1-67	9/21/95	Warrick memo Dave Reich to C. Hagman re: Price Change for Albuterol 20 mL	FRE 403	SP/W
719	WCT003183 6 WCT002015 9 WCT013503 6 WCT000242 7 WCT006212 3		Albuterol Price Notices	FRE 403	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
	WCT001209 3-96 WCT001292 3 WCT002015 8 WCT002219 7 WCT002224 8 WCT002225 1 WCT002229 4 WCT013336 3 WCT001273 3 WCT013453 6 WCT013460 8 WCT013442 9 WCT013454 8 WCT003378 5 WCT013445 8 WCT013453 2 WCT013442 1 WCT013460 2 WCT003378 2 WCT013442 0 WCT013443 5 WCT013452 8 WCT013460 1 WCT013468 3				

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
	WCT013336 4-66 WCT001207 3 WCT002002 3 WAR002410 6 WCT013441 8 WCT013451 7 WCT013406 9 WCT000262 2 WCT001219 7 WCT001213 6 WCT013447 3 WCT013456 5 WCT000201 7 WCT000202 3 WCT013456 1 WCT000202 1 WCT013473 8 WCT013446 9 WCT000201 9 WCT008844 5 WAR001181 2 WCT003376 9 WCT014075 1 WCT008843 4 WCT002296 7 WAR003832 1 WCT002240 8 SW0173547 CT0033756				

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
	WCT014557 0-72 WCT007308 2 WCT000181 6 WCT003356 3 WAR005317 3 WCT003355 5 WCT003353 8 WCT008845 4 WCT003349 8 WCT002242 6 WCT008986 1 WCT008983 5 WCT008875 1 WCT008882 1 WCT008979 4 WCT008978 4 WCT008994 2 WCT008872 1				
720	SPF0001325 5		Intron-A pricing and reimbursement	Hearsay Incomplete	SP/W
721	SPF0001169 5-96	7/7/01	E-mails re: Intron Reimbursement Issues- Summary and Calculation of Medicare Reimbursement- Example	No objection	
722	SW0720309-56	8/23/02	Intron-A Oncology 2003 Marketing Plan	No objection	
723	SW0719241		Cost Analysis for Superficial Bladder Cancer	FRE 403	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
724	SPF0001171 8-20	5/26/00	E-mail Jack Gomm to Jorge Diaz re: DTIC Admin. Analysis for profitability, and reimbursement for Temodar vs. DTIC	No objection	
725	SPF0001196 9-70		Temodar Information Sheet – Off-Label and Reimbursement	Hearsay	SP/W
726	SPF0001197 1-80		PowerPoint Presentation of Temodar: Dispensing Reimbursement and Managed Care	Hearsay Lack of Foundation	SP/W
727	SPF0001169 1-94	7/19/02	E-mail exchanges between Jorge Diaz, Karen Freeman, Robin Smith and Ray Ledford re: Medicare Reimbursement for Temodar	Relevance	SP/W
728	SW0639131- 49		ITG Overview	Relevance Incomplete Lack of Foundation	SP/W
729	SPF0092059 -64	6/18/99	E-mail James Fitzpatrick to Kathleen Hurtado re: draft ITG Business Review	Relevance Hearsay	SP/W
730	SW0024429 8-300		ITG organization chart of employees and the employees accounts	Relevance	SP/W
731	WCT014536 7-75	9/2/97	Fax Peter Janis to Raman Kapur attaching draft TMS Business Review	Relevance	SP/W
732	WCT014606 1-76		TMS/Warrick Rebates, Fees, Check Requests and Agreements	FRE 403	SP/W
733	WCT014597 7-94		TMS/Warrick Pharmacy Rebate Check/Invoice Audit, Invoices, Discount Check Promotion, Product Summary Reports and Check Request	FRE 403	SP/W
734		11/14/94	Warrick letter Harvey Weintraub to Lee Edelstein of TMS re: telemarketing and costs	Relevance	SP/W
735	WAR004158 3-96	9/12/02	Fax Warrick Pharmaceutical Training for Access Worldwide manual for telemarketing	Relevance	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
736	SW0041080-2		Email from Todd Grisco to Craig Granowitz re: CTC ad BIC data. Attached is 2001 CTC Free Drug (\$) with handwritten notes	Relevance Lack of Foundation	SP/W
737	SPF0000499-501		Email chain from Aracelia Vila to Kathy Zonca, Holly Wong, Donna Conroy re: Commitment to Care	Relevance	SP/W
738	SPF00019460-1		"Commitment to Care Program" Business Review Major Findings	Relevance	SP/W
739	SPF00020502-5		Email from Todd Grisco to Douglas Subers, Pilar Villegas, James Fitzpatrick re: 2001 CTC numbers and attaching documents 2001 CTC Free Drug (\$) and CTC Reimbursement Found 2001 Summary	Relevance	SP/W
740	SPF00020506-8		Email from Todd Grisco to James Fitzpatrick re: 2001 CTC Free Drug and attachment	FRE 403	SP/W
741	SPF00011517-46		Email and attachment from Agnes DeOcampo to Jorge Diaz re: Possible addition of Intron Drug Replacement in Schering SOP	FRE 403	SP/W
742	SPF00011506-16		Email and attachment re: Temo economics. Attachment is "Impact of Financial Burden on Prescribing Patters" slideshow	FRE 403	SP/W
743	SW0026577-96		Commitment to Care Charts (McKesson/HDS)	FRE 403	SP/W
744	SW0036906-22		Memoranda from Kennedy Mohammed to Linda Hagman re: CTC Credit	FRE 403	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
745	SPF0171131-9		Email and attachments from Steven Petruccelli to Ray Ledford, Joan Chiaviello, Mark Mazo, Jane Detrie, Janet Gusmerotti, Ronald Taylor, Russell Hubbs, Vincent Lawler, Jeff Sherman, Jack Micali Chuck Pearson, Sheri Jepson, Jeffrey Pfister, Thomas Saenz, Mary Metheny, Thomas Lander, Joanne Steele, Scott Yokobosky, Gregory Meadows, Harry Durr re: CTC Overview and Flowcharts	FRE 403	SP/W
746	FDB-AWP 04170	7/16/02	Letter from Henry Weintraub to Kay Morgan re: Albuterol pricing	Relevance Lack of Foundation	SP/W
747	SP 0012851-54	6/4/93	Memo from R.M. Loughlin to Attendees re: Albuterol launch	Relevance	SP/W
748	WP0000151 5A	11/29/93	Rx Product Introduction/Change Notice re: Albuterol Inhalation Aerosol- Warrick	Relevance	SP/W
749	WP0001723 0A-39A	1/1/94	Consulting Agreement between Schering Corporation and M&H Associates	Relevance	SP/W
750	WPX000770 6-07; WPX000770 9	Undated ; 12/8/95; 11/16/95	Undated filed folder titled "Greens" ; Rx Product Introduction/Change Notice re: Albuterol Inhalation Aerosol	FRE 403	SP/W
751	WPX000767 6	12/6/95	Memo from P. Sinoradzki to C. Hagman re Revised Price for Albuterol Sulfate, USP Inhalation Solution 0.05% 20 mL	FRE 403	SP/W
752	WP 00017242A; WP 0001893 4A	9/17/96; 5/29/01	Caremark Prescription invoice for Albuterol; Merk-Medco Rx invoice for Albuterol	FRE 403	SP/W
753	WP0001205 3A-84A	10/96-10/97	Warrick Pharmaceuticals Policy and Procedure	No objection	
754	AGOWP-012498-500	2/28/96	Memo from D. Reich to L. Colantuano/R. Ecker re: Warrick Pricing Review	FRE 403	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
755	SP 0013845	6/1/93	Memo from Harvey Weintraub to Richard Zahn re: Warrick Albuterol-Retail Buying Groups	Relevance	SP/W
756	WP 0038221A-22A	11/8/02	Document titled "Lowest Price Calculation (Effective 11/8/02)" transmitted from H. Weintraub to R. Kapur, R. Gerardino and J. van Schaften	FRE 403	SP/W
757	WP 0024172A-75A	3/22/01	Fax from Harvey Weintraub to Jerry Sherman and Walt Gough with attached Price Comparison Report for Effective Date 03/33/2001	FRE 403	SP/W
758		9/27/01	Warrick Price File By NDC Desc.	FRE 403	SP/W
759	WP0000280 9A-10A	10/31/96	Warrick Price File By Name	FRE 403	SP/W
760	RGX 0173029-196		Company Policy & Procedure Manual For Field Sales Representatives	No objection	
761	RGX 0255855-76	11/01	Getting Away from AWP: Changing Medicare and Medicaid Drug Reimbursement	Hearsay Lack of Foundation	SP/W
762	WPX000330 9-20		Rebate Agreement Between The Secretary of Health and Human Services and Warrick Pharmaceuticals Corporation	Relevance	SP/W
763	TX-D 7 W-012307; TX-D 7 W-012309-10	9/3/93	Letter from Henry Weintraub to Beth Rader and Ed Edelstein re: new Albuterol package size	FRE 403	SP/W
764	TX-D & W-012308; TX-D & W-12305	10/12/93	Letter from Henry Weintraub to Beth Rader and Ed Edelstein re: Albuterol price change	FRE 403	SP/W
765	WP0000177 5A	8/26/94	Letter from Angela Glauberzon to Sean O'Connell re: Albuterol in the Virginia generic substitution formulary	Relevance Hearsay	SP/W
766	WP0000162 9A	12/30/95	Letter from Phyllis Sinoradzki to Michael Neff, Chief, Medi-Cal Contracting Section re: Albuterol availability	Relevance Lack of Foundation	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
767	RGX 0056642	9/12/94	Letter from Henry Weintraub to Beth Radar re: Perphenazine pricing	Relevance	SP/W
768	RGX 0056639; RGX 0056666	4/12/95; 11/16/95	Letters from Henry Weintraub to Beth Radar re: Perphenazine pricing	Relevance	SP/W
769	RGX 0086536-44	1/31/02	Warrick Price File By Name	FRE 403	SP/W
770	WP0001212 8A	9/21/95	Letter from Jerome Sherman to Brian Slusser re: Albuterol Pricing	FRE 403	SP/W
771	RGXA 0098615-23		Handwritten notes re: Albuterol pricing	Lack of Foundation	SP/W
772	WP0000481 5A-18A	12/22/95	Letter from Peter Kamins and Henry Weintraub to Michael LaBreque of Jack Eckard Corp. re: Proventil Chain Market Share Program	FRE 403	SP/W
773	SP0004426; SP0004428	3/15/96	Contract between Warrick and HealthPartners for Albuterol	No objection	SP/W
774	RGXA 0035102		Medicap Pharmacies, Inc. Generic Vendor Selection Criteria/Generic Product Selection Criteria	Relevance Hearsay Incomplete	SP/W
775	RGXA 0085152		Handwritten notes "Action Steps"	Relevance Lack of Foundation	SP/W
776	SP 0004773-77	1/20/97	Letter to Paul Pelanek of Pharmaceutical Buyers, Inc. from Lissa Colantuono re: administration fees with attached price charts	Relevance	SP/W
777	RGX 0002271; RGX 0002310		PharmaGen promotional piece and pricing chart	Relevance Hearsay Incomplete	SP/W
778	WP 0023700A	12/3/93	Memo from Harvey Weintraub to Distribution re: HCFA – MAC Rulings	Relevance	SP/W
779	RGXA 0035098-102	6/8/95	Letter from Janet Miller of Medicap Pharmacies, Inc. to Jerry Sherman	Relevance	SP/W
780	RGX 0178842		Potential Discussion Points of Interest to Eckerd's	Hearsay Incomplete	SP/W
781	SP 0002800		Warrick Pharmaceutical product chart	Hearsay Incomplete	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
782	AGOWP-000202; WP0000137 2A	7/8/99; 3/2/99	Memo from Jerome Sherman to Martha Torres re: Albuterol price change; Warrick Account Information Form re price change for Albuterol	Relevance	SP/W
783	RGX 0179000		Preferred Rx Options – Program Features for Branded Pharmaceutical Suppliers	Hearsay Relevance	SP/W
784	RGX 0068132-33	10/19/98	Memo from Harvey Weintraub to R. Kapur re: AWP Warrick ISMN Tablets and Memo from Jerry Sherman to Harvey Weintraub re: ISMN Market Information	Relevance	SP/W
785	RGX 0276183	10/26/98	Memo from L. Manfredi to C. Hagman re: Isosobide Mononitrate Extended Release Tablets 60mg	Relevance	SP/W
786	WP 0024149A- 67A		Telemanagement Services, Inc. Telephone Communications Skills Training Module 2 for Pharmacy Department Representatives	Hearsay Relevance	SP/W
787	WP0001440 7A-08A		Access Worldwide – Site Visit Issue	Lack of Foundation	SP/W
788	WP0001440 5A-06A		Possible Issues	Hearsay Incomplete	SP/W
789	WP 0024115A; WP 0024114A; WP 0024156A	6/25/01; 7/16/01	Letter from Harvey Weintraub to Francine Kositsky re: Telemanagement Services Training Manual; Letter from Harvey Weintraub to Francine Kositsky re: insert (attached) to Warrick Sales Training Manual for Telemarketers	Relevance Incomplete	SP/W
790	WP 0024147A	5/1/01	Warrick Pharmaceuticals Discount Check Promotions	FRE 403	SP/W
791	RGX 0016763	9/8/98	Memo from R. Kapur to D. Malanga, et al. re: Price Reports to Third Parties; AWP, WAC, etc.	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
792	WPX0006891	7/26/96	Letter from Joseph E. Davis, State of Maryland DHMH, to Drug Manufacturers re: Albuterol pricing	Relevance Hearsay	SP/W
793	RGXA 0007659-61	7/2/98 (letter)	File folder titled "Arkansas DUR"; Handwritten note to Manfredi from Weintraub; Letter from Thelma Underwood, Arkansas Dept. of Human Services, to L. Manfredi	Relevance Hearsay Lack of Foundation	SP/W
794	WP0000083 8A-42A	3/11/97	Letter from Louis Manfredi to Martha McNeil re: Warrick Pharmaceuticals Product Line with attachments	Relevance	SP/W
795	WFL0094430	3/11/97	Letter from Louis Manfredi to Martha McNeil re: Warrick Pharmaceuticals Product Line with attachments	FRE 403 Lack of Foundation	SP/W
796	RGX 0190051-69		File folder titled "First Data bank Folder"; letter from Chris Bovard to Janice Brennan with attached Price Report	Hearsay FRE 403	SP/W
797	RGX 0190087-88	12/98	Letter from Chris Bovard to Valued Customer re: MDDB product line	Relevance Hearsay	SP/W
798	FDB-Florida 000468	4/8/02	Letter from Janice Brennan to Marc Shirley re: Isosorbide Mononitrate	Relevance	SP/W
799	RGX 0190075-84		National Drug Data File Product Update Report Prepared By First DataBank	Hearsay FRE 403	SP/W
800	RGX 0189706-07	7/16/99	Letter from Lola Nannas of Red Book to Pharmaceutical Manufacturers re: product pricing	Hearsay Relevance	SP/W
801	RGXA 0085145	7/16/02	Letter from Harvey Weintraub to Kay Morgan re: Albuterol pricing	Relevance	SP/W
802	RGX 0258420	9/6/02	Memo from Janice Brennan to Harvey Weintraub re: Redbook – Missing Product Listings – Update	Relevance Lack of Foundation	SP/W

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
803	RGX 0258301-10	6/11/02	Letter from B. Kennedy to Linda Panke re: Albuterol pricing with attached Pricing Service Listings	Relevance	SP/W
804	SPF0226510 -11	5/20/02	E-mail from R. Kapur to Dan Valerio, et al. re: Proventil Solution Launch Mailings	Relevance	SP/W
805	SPF0129237	1/5/02	Email from Janice Brennan to Romilda Heatter re: Warrick Pricing Letters for ME 04/30/02	Relevance	SP/W
806	RGX 0219435	1/2/96	AWP Package Pricing History for Albuterol from Analy\$ource	Hearsay Lack of Foundation	SP/W
807		3/27/06	Notice of Deposition of Defendant Warrick Pharmaceuticals Corporation in State of Wisconsin v. Amgen	Relevance	SP/W
808		2/21/06	Notice of Taking Depositions	Relevance	SP/W
809	RGX 0315084-141	8/12/99	Letter to Thomas Bliley from Richard Zahn	No objection	
810	RGX 0154625-48	8/1/97	Memorandum to Distribution from Linda Zhou re: Managed Care/ITG Reporting Package	Relevance	SP/W
811	WP0000000 65A-67A	10/12/93	Letter to Martha McNeil from Harvey Weintraub	FRE 403	SP/W
812			1998 Drug Topics Red Book (Excerpts)	Hearsay FRE 403	SP/W
813			Printout from the National Pharmaceutical Council Website titled "About NPC"	Hearsay Relevance	SP/W
814		00/00/00	Pharmaceutical Benefits Under State Medical Assistance Programs	Relevance Hearsay	SP/W
815		8/14/00	Email to Harvey Weintraub from Dan Valerio re: Redbook Omissions Letter	FRE 403	SP/W
816		12/11/97	Memorandum to R. Cesan and R. Zahn from Linda Zhou re Pacificare Proposal	Relevance	SP/W
817	MDL- CEN000553 07-13	6/21/02	Rebate Agreement Between Harvard Pilgrim and Johnson & Johnson	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
818	MDL- CEN000555 37-42	2/26/03	Rebate Agreement Between Fallon Clinic and Centocor Inc.	No objection	
819	MDL- CEN000139 66; 13970; 14835; 14008; 13994; 14027; 13976-77	6/13/01	Composite Exhibit of Price Increase Letters from Ron Krawczyk	No objection	
820	MDL- CEN000142 34; 13287; 14836; 14231; 14091	11/3/00	Composite Exhibit of Price Increase Letters from Ron Krawczyk	No objection	
821	MDL- CEN000148 38; 13917-18	3/23/00	Composite Exhibit of Price Increase Letters from Ron Krawczyk	No objection	
822	MDL- CEN000000 05; 7; 13; 13718	6/18/99	Composite Exhibit of Price Increase Letters from Mike Ziskind & Ron Krawczyk	No objection	
823	WKH 01027- 28	9/1/98	Price List for Remicade	No objection	
824	MDL- CEN000827 02-03	3/23/00	Interoffice Memorandum from Tom Weiss re: Remicade 4.9% Price Increase	No objection	
825	MDL- CEN000126 67		Remicade Price Increase History	No objection	
826	MDL- JJ00000108- 110	7/8/02	Email from Patricia Molino re: AWP Discrepancy Questions	No objection	
827	MDL- JJ00000095- 96	6/20/02	Email from William Baxter to Diane Ortiz re: AWP Analysis	No objection	
828	MDL- CEN001036 88-90	9/22/02	Email from Seth Fischer re: AWP Reporting Issue: an Overview	No objection	
829	MDL- OBI0000762 0	7/11/01	Email from Timothy Traver to Cathleen Dooley re: AWP vs. Acquisition Cost	No objection	
830		12/03/03	Amended Notice of Rule 30(B)(6) Depositions	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
831	MDL-CEN000139 65; 13969; 14002; 14004; 14008	6/13/01	Composite Exhibit of Price Increase from Ron Krawczyk	No objection	
832	MDL-CEN000304 66-67	3/16/98	Interoffice Memorandum from Matthew Carpenter to J. McHugh & J. Kerrigan re: Average Acquisition Price vs. Average Acquisition Price	No objection	
833	MDL-CEN000055 08-10	2/21/02	Email from Michael Ziskind to Rick Anderson re: AWP Pricing Per My Voice Mail	No objection	
834	MDL-CEN000559 24-88		Centocor Records Retention Schedule – Version 1.0	No objection	
835	MDL-CEN000271 34-52	1/22/03	Email from John Hoffman to Tom Weiss attaching PBM SPP Strategy	No objection	
836	MDL-CEN000145 97-98	00/00/01	Remicade RA 2001 Tactical Budget	No objection	
837		8/2/05	Notice of 30(B)(6) Deposition of Defendant Centocor Concerning Dealings With Private Insurers and Payors	No objection	
838	MDL-CEN000247 08-10	8/20/99	Cost Comparison of Anti-TNF Agents in Rheumatoid Arthritis Patients Receiving Methotrexate for Plan & Group Members	No objection	
839	MDL-CEN000715 90-92	2/22/02	Email from Tony Vernon to Michael Ziskind re: AWP Reporting Issue: An overview	No objection	
840	MDL-CEN000305 94-610	7/1/02	Email from Cheryl Kramer re: Direction to the Field Sales Organization Re: Flat Infusion Advocacy	No objection	
841	MDL-CEN000007 11-718	9/24/01	Rebate Agreement – The Regence Group	No objection	
842	MDL-CEN000679 57-58	5/22/01	Interoffice Correspondence to Bob Savage from Dave Holveck re: Confidential – Proposed Remicade Price Increase	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
843	BMS/AWP/0 01483100-21	2/4/03	Email from Marsha Peterson to Doug Storer re: POA Powerpoint	No objection	
844	BMS/AWP/0 01487357-62		Smart Practices Require Best Practices from the OTN Website	No objection	
845	BMS/AWP/0 01487883-5001	3/24/03	Memorandum from Marsha Peterson to Gena Cook re: Western Region Summary –April 2003	No objection	
846	BMS/AWP/0 01484077-101	6/6/03	Email from Jim Smith to Marsha Peterson, Joseph Wornson & Gena Cook re: MSHO BID	No objection	
847	BMS/AWP/0 01487993-95	8/19/02	Email from Julie Trueblood re: Gabor Kovacs MD/#200600/Laguna Beach/CA/MOASC	No objection	
848	BMS/AWP/0 01484591-613	2/26/03	Email from Gena Cook to Marsha Peterson & Todd Little re: OHOA with Drug Purchases	No objection	
849	Roger Belltje 03291-304	8/22/95	RedBook Product Listing Verification	Lack of foundation Hearsay Relevance as to drugs not in the case	Track 1 Defendants
850	Roger Belltje 03228-242	9/26/96	RedBook Product Listing Verification	Lack of foundation Hearsay Relevance as to drugs not in the case	Track 1 Defendants
851	AWP-PIPE 00002-000037	11/1/05	Pipefitters Local 537 January 1, 2006 Renewal	No objection	
852	AWP-PIPE 000038-000065	11/1/00	Pipefitters Local 537 January 1, 2001 Renewal	No objection	
853	AWP-PIPE 000066-000093	11/9/98	BCBS Pipefitters Local 537 January 1, 1999 Renewal	No objection	
854	AWP-PIPE 000094-000109	9/24/99	Administrative Service Account Agreement	No objection	
855	AWP-PIPE 000144A-000159	11/1/03	BCBS Pipefitters Local 537 January 1, 2004 Renewal	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
856	AWP-PIPE 000160- 000188	10/22/02	Pipefitters Local 537 January 1, 2003 Renewal	No objection	
857	AWP-PIPE 000189- 000223	11/2/01	Pipefitters Local 537 January 1, 2002 Renewal	No objection	
858	AWP-PIPE 000255- 000283	10/25/99	Pipefitters Local 537 January 1, 2000 Renewal	No objection	
859	AWP-PIPE 000316- 000342	2000	Pipefitters Union Local 537 Health & Welfare Plan Benefits Design	No objection	
860	AWP-PIPE 000389- 000483		Benefit Description, Major Medical	No objection	
861	AWP-PIPE 000518- 000522	3/31/03	Wall Street Journal Article “Hired to Cut Costs Firms Find Profits in Generic Drugs	No objection	
862	AWP-PIPE 000523- 000556	1/1/03	Express Scripts, Inc. Managed Prescription Drug Program Agreement	Relevance	Track 1 Defendants
863	AWP-PIPE 000599- 000607	12/04	Select Pages of Redbook December 2004 Update	Hearsay	Track 1 Defendants
864	AWP-PIPE 000609- 000617	7/9/91	Account Agreement Entered Into with BCBS MA	No objection	
865	AWP-PIPE 000618- 000625	9/8/92	Account Agreement between Blue Cross Blue Shield of Massachusetts and Pipefitters Local	No objection	
866	AWP-PIPE 000661- 000676	11/30/99	Administrative Services Account Agreement	No objection	
867	AWP-PIPE 000680- 000766	7/1/98	Master Medical Benefit Description	No objection	
868	AWP-PIPE 000792- 000833	-	Master Medical Benefit Description	No objection	
869	AWP-PIPE 000834- 000920	1/1/04	Benefit Description Master Medical	No objection	
870	AWP-PIPE 000921- 001008		Pipefitters Local Union 537 Health & Welfare Plan Benefits Description	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
871	P 001294-1417	2/00/00	United Food and Commercial Workers Unions and Employers Midwest Health Benefits Plan	No objection	
872		11/1/99	Blue Cross Blue Shield of Illinois – Network Administration Agreement	No objection	
873	BCBSMA-AWP-00012-27	2/7/04	Analysis of CMS Average Wholesale Price Reform – Reimbursement for Part B Drugs	No objection	
874	BCBSMA-AWP-000124-53	7/26/99	Memo Ellen Thompson, Provider Reimbursement, to Ann Meneghetti, Medical Affairs, re: BCBSMA Reimbursement Policy Physician Dispensed RX	No objection	
875	BCBSMA-AWP-10002-05	1/00/02	POS Outcomes Newsletter – Injectables: Don’t Get Stuck without a Plan for 2002	Hearsay	Track 1 Defendants
876	BCBSMA-AWP-10569-74		Project Organizational Structure, Team Composition and Responsibilities	No objection	
877	BCBSMA-AWP-10586-91		Specialty Pharmacy Overview of RFP Response	No objection	
878	BCBSMA-AWP-10592-604		Specialty Pharmacy Overview	No objection	
879	BCBSMA-AWP-10605-08		PFSW Steering Committee Meeting- BC65 Drug Change Impact	No objection	
880	BCBSMA-AWP-10609-10	4/26/04	Provider Financial Strategy Workgroup (PFSW)	No objection	
881	BCBSMA-AWP-11599-609	12/15/04	Analysis of CMS Average Wholesale Price Reform – Reimbursement for Part B Drugs	No objection	
882	BCBSMA-AWP-11610	4/19/04	Email Mike Mulrey to Deb Devaux, Steven Fox, John Killion and Jan Cook re: Impact of CMS Change in Drug Reimbursement	Hearsay	Track 1 Defendants

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
883	BCBSMA-AWP-11611-12	3/22/04	Email re: Blue Cross Fee Schedule	Hearsay	Track 1 Defendants
884	BCBSMA-AWP-11613-31	1/00/04	Email Jan Cook to Peter Goldbach, Barry Zallen and John Fallon re: BC65 Drug Change Impact with attached analysis	Hearsay	Track 1 Defendants
885	BCBSMA-AWP-12120-46		BCBSMA Organizational Charts	No objection	
886	BCBSMA-AWP-12501	7/11/05	Provider Financial Strategy Workgroup (PFSW)	No objection	
887	BCBSMA-AWP-12507	6/02/03	Email Deborah Munro to John Killion re: Revised Saving Projections	Hearsay	Track 1 Defendants
888	BCBSMA-AWP-12508-09		Chart – BCBSMA '02 Spend @ Caremark by Drug Name w/extended AWP and Savings Projection based on Offer	No objection	
889	BCBSMA-AWP-12522-24	9/2/03	Email Laura Liscio to Heather Cooke and John Killion re: AAHP Alert: AAHP Medicare Update #03-43a – CMS Published Proposed Rule To Pay Appropriately For Medicare-Covered Drugs	No objection	
890	BCBSMA-AWP-12525-50	8/20/03	Federal Register, Department of Health and Human Services, Centers for Medicare and Medicaid Services- 42 CFR Part 405 Medicare Program; Payment Reform for Part B Drugs; Proposed Rule	No objection	
891	BCBSMA-AWP-12556-57	6/2/04	Email Janis Pochini to Laura Liscio, Heather Cooke and John Killion re: Final Discounts	Hearsay	Track 1 Defendants
892	BCBSMA-AWP-12558	3/26/04	Email Janis Pochini to John Killion and Laura Liscio re: Confidential Update	Hearsay	Track 1 Defendants
893	BCBSMA-AWP-12568	6/17/03	Email Timothy Fitzgibbons to John Killion, Kim Olson, Annmarie Poopor and Rina Vertes re: Specialty Drug Update	Hearsay	Track 1 Defendants

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
894	BCBSMA-AWP-12576	2/7/05	Email John Killion to Jan Cook and Holly Grinnell re: AWP Drug Analysis	No objection	
895	BCBSMA-AWP-12577-87	12/15/04	Analysis of CMS Average Wholesale Price Reform – Reimbursement for Part B Drugs	No objection	
896	BCBSMA-AWP-12611-12	4/10/05	Interoffice Memo Jan Cook to John Fallon, Deb Devaux and John Killion re: 4/6/05 Meeting with Massachusetts Society of Oncology (MSCO)	No objection	
897	BCBSMA-AWP-12960-3001	7/00/00	BCBSMA, Inc. Indemnity Product Ancillary Professional Group Agreement	Hearsay Relevance	Track 1 Defendants
898	BCBSMA-AWP-13013-14	3/4/04	Email Jan Cook to others re: Follow up to 2/23/02 Masco meeting	Hearsay	Track 1 Defendants
899	BCBSMA-AWP-13028-38	7/11/05	2005 Hospital Contracting Plan, PFSW	Illegible (BCBSMA-AWP-13034)	Track 1 Defendants
900	BCBSMA-AWP-13100-10	11/9/05	BCBSMA Outpatient Fee Schedule Update Project	Relevance	Track 1 Defendants
901	BCBSMA-AWP-17052-54		Website ReimbursementCodes.com - Features and Benefits, New Feature- Medicare Part B vs. Part D Prescription Drug	Hearsay Incomplete	Track 1 Defendants
902		1/00/99	BCBSMA HMO Blue Products Group Primary Care Physician Agreement	No objection	
903		9/00/00	BCBSMA HMO Blue Product Group Primary Care Physician Agreement	Hearsay Relevance	Track 1 Defendants
904		11/00/02	BCBSMA HMO Blue Product Group Primary Care Physician Agreement	Hearsay Relevance	Track 1 Defendants
905	GSK-MDL-KY04 000344-437	2/6/95	Letter to Charles Wakerly from Timothy Proctor	Relevance Hearsay FRE 403 see Track 1 defendants' <u>in limine</u> motion	Track 1 Defendants

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
906	GSK-MDL-ZN02-101584-85	2/4/95	Letter to Adriann Carter from Ursula Bartels re: Promotional Complaint	Relevance Hearsay FRE 403 see Track 1 defendants' <u>in limine</u> motion	Track 1 Defendants
907	GSK-MDL-KY04 000540-42; GSK-MDL-KY01 005532-42	2/22/95	Letter to Timothy Proctor from Ursula Bartels	Relevance Hearsay FRE 403 see Track 1 defendants' <u>in limine</u> motion	Track 1 Defendants
908	GSK-MDL-KY03 000194-227	4/25/95	Letter to Ursula Bartels from Adrianna Carter	Relevance Hearsay FRE 403 see Track 1 defendants' <u>in limine</u> motion	Track 1 Defendants
909			Blank		
910		3/14/02	Testimony of Thomas A. Scully, Administrator of Centers for Medicare & Medicaid Services, on Reimbursement & Access to Prescription Drugs under Medicare Part B, Senate Finance Committee, Subcommittee on Health	No objection	
911		4/00/03	OIG Compliance Program Guidance for Pharmaceutical Manufacturers	Relevance	Track 1 Defendants
912		12/15/05	Declaration of Raymond S. Hartman in Support of Plaintiffs' Claim of Liability and Calculation of Damages	Daubert Hearsay	Track 1 Defendants
913		12/6/01	Sentencing Memorandum of the United States. <i>United States v. TAP Pharmaceutical Products, Inc.</i> , No. CR-01-10354-WGY (D. Mass. Dec. 6, 2001)	Relevance FRE 403	AstraZeneca

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
914		12/6/01	<i>United States v. TAP Pharmaceutical Products, Inc.</i> , No. CR-01-10354-WGY (D. Mass. Dec. 6, 2001) – Disposition	Relevance FRE 403	AstraZeneca
915	TAP 5030224-458		Document titled “Big Mac Attack – Coach’s Playbook”	Hearsay FRE 403 Authentication	AstraZeneca
916		9/28/00	Letter from the House of Representative Committee on Ways and Means, Subcommittee on Health, to President of the Pharmaceutical Research and Manufacturers of America	No objection	
917		10/31/00	Letter from Congressman Stark to Commissioner of the Food and Drug Administration	No objection	
918		12/6/00	Letter from Congressman Stark to Chief Counsel to the HHS Inspector General dated December 6, 2000; and Letter to Nancy-Ann Min DeParle from Thomas Bliley	No objection	
919		6/20/03	Department of Justice Press Release “AstraZeneca Pharmaceuticals LP Pleads Guilty to Healthcare Crime: Company Agrees to Pay \$355 Million to Settle Charges”	Relevance FRE 403	AstraZeneca
920		1/23/01	Department of Justice Press Release “Bayer to Pay \$14 Million to Settle Claims for Causing Providers to Submit Fraudulent Claims to 45 State Medicaid Programs”	Relevance Hearsay FRE 403 <i>see</i> Track 1 <u>in</u> <u>limine</u> motion	Track 1 Defendants

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
921	AM0038593-628		Aranesp Playbook Pricing & Contracting	Hearsay Relevance FRE 403 Not properly authenticated/ lacks proper foundation	J&J
922	AM0994157-58	12/13/02	Email from Mike Charles re: Important Ortho Competitive Information	Hearsay Relevance FRE 403 Not properly authenticated/ lacks proper foundation	J&J
923	AM0933042	4/8/02	Email from Amy Oliver re: Procrit Patient Access Program	Hearsay Relevance FRE 403 Not properly authenticated/ lacks proper foundation	J&J
924	AM0079358 9-98	9/17/04	Ortho Contract Update	Hearsay Relevance FRE 403 Not properly authenticated/ lacks proper foundation	J&J
925	AM0016337 6-79	00/00/04	Analysis by Amgen of the Updated Procrit Physician Office Contract	Hearsay Relevance FRE 403 Not properly authenticated/ lacks proper foundation	J&J
926	AM0097610 6-07	1/9/04	Email from Amy Oliver to Mike Charles re: Economic Analysis Workshop	Hearsay Relevance FRE 403 Not properly authenticated/ lacks proper foundation	J&J

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
927	AM0097610 8-16	7/1/03	Draft Rebate Agreement	Hearsay Relevance FRE 403 Not properly authenticated/ lacks proper foundation	J&J
928	AM0976123- 24		Hospital Economic Analysis	Hearsay Relevance FRE 403 Not properly authenticated/ lacks proper foundation	J&J
929	AM0097611 7-18		Physician Office Economic Analysis	Hearsay Relevance FRE 403 Not properly authenticated/ lacks proper foundation	J&J
930	AM0097611 9-20		Physician Office Economic Analysis	Hearsay Relevance FRE 403 Not properly authenticated/ lacks proper foundation	J&J
931	AM0097612 1-22		Hospital Economic Analysis	Hearsay Relevance FRE 403 Not properly authenticated/ lacks proper foundation	J&J
932	AM0018037 5-97		Updated Procrit – Physician Office Contract	Hearsay Relevance FRE 403 Not properly authenticated/ lacks proper foundation	J&J
933			Table 1A: Exemplar Defendant Drug List	Daubert	Track 1 Defendants

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
934			Distribution of Supplementary Health Insurance for the Medicare Population, 1996 Fee-for-Service Enrollees	Hearsay Authentication	Track 1 Defendants
935	BMSAWP/0 011214; BMSAWP/0 011221	9/6/1995	Etopophos Launch Plan	Authenticity, incomplete document; also duplicative of PX 208; relevance, Plan was not adopted	BMS
936	BMS/AWP/0 00157426		Taxane Economics	Authenticity Incomplete document No foundation	BMS
937	BMS/AWP/0 00157428		Weekly Taxol Administration 80 mg/m2	Authenticity Incomplete document No foundation	BMS
938	AZ0037018- 19	3/22/95	Memo from Oncology Specialty Marketing Team to Specialty Case Representatives re: New Case Quantity Discount	No objection	
939	FDB-AWP 04045	2/28/00	Mailgram from Chris Bovard to Dear Customer	Relevance FRE 403	SP/W
940	MDL- CEN000040 25	11/7/00	Letter from Kelly Petrison to Mike Ziskind	Hearsay	J&J
941	BMSAWP/0 011250	10/3/93	Letter from Denise M. Kaszuba to Mr. Edelstein	No objection	
942			Page 19 of a Banc of America Securities report re "Health Care Technology and Distribution"	Incomplete document Hearsay	Track 1 Defendants
943		7/2003	Pages 2-5 of a Dyckman & Associates, LLC report titled "Health Plan Payment for Physician-Administered Drugs"	Incomplete document Hearsay	Track 1 Defendants

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
944	BMS/AWP/000100778		Document titled "Average Wholesale Price (AWP)"	No objection	BMS
945	BMS/AWP/000125509	2000	Slide: "Average Whole Price (AWP)"	No foundation Hearsay Not a BMS document (part of an AdvancePCS presentation)	BMS
946	BMS/AWP/000101009-10		Slides: "How Drugs are Reimbursed"	No objection	BMS
947	BMS/AWP/000192749		Slide: "Variations on AWP or WLP"	No objection	BMS
948			Chart: "The Major PMSs All Use The AWP Benchmark In Their Contracts with Heath Plan Clients" (7 pages)	Relevance PBM conduct not at issue Hearsay Daubert	Track 1 Defendants
949			Chart: "The Major PBMs All Use The AWP Benchmark In Their Contracts with Retail Pharmacies" (5 pages)	Relevance PBM conduct not at issue Hearsay Daubert	Track 1 Defendants
950	CVH 000028-31	5/10/04	Document titled "Coventry Heath Care National Retail Pharmacy Agreements"	Hearsay Relevance FRE 403	Track 1 Defendants
951	BMS/AWP/000125508-15	2000	Presentation by Todd Guinn "Drug Pricing"	Lack of foundation Hearsay Not a BMS document (AdvancePCS presentation) Relevance Does not relate to drugs at issue	BMS
952		January 2003	California HealthCare Foundation report: "Navigating the Pharmacy Benefits Marketplace"	Hearsay Relevance	BMS

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
953	SMWMASS 001240-47		Sheet Metal Workers' National Health Fund payment records for Paraplatin	Relevance	Track 1 Defendants
954	SMWMASS 000605		Sheet Metal Workers' National Health Fund payment records for Cytosan and Rubex	Relevance	Track 1 Defendants
955	SMWMASS 000092-96		Sheet Metal Workers' National Health Fund payment records for Procrit	Relevance	Track 1 Defendants
956	SMWMASS 001174-76		Sheet Metal Workers' National Health Fund payment records for Zoladex	No objection	
957	SMWMASS 000576-80		Sheet Metal Workers' National Health Fund payment records for Albuterol	Relevance	Track 1 Defendants
958	MDLW 25203-09	4/21/99	Memo from Tim Callahan to Dariush Ashraft, et al. re: Pricing Issues	Relevance Hearsay FRE 403 <i>see</i> Track 1 <u>in</u> <u>limine</u> motion	Track 1 Defendants
959	PH 025785-94		Strategic Presentation on Average Wholesale Price (AWP)	Relevance Hearsay FRE 403; <i>see</i> Track 1 <u>in</u> <u>limine</u> motion	Track 1 Defendants
960	MDLW 05457-77		PowerPoint: Pricing & Reimbursement Key Strategies for Success	Relevance Hearsay FRE 403 <i>see</i> Track 1 <u>in</u> <u>limine</u> motion	Track 1 Defendants
961	MDLW 12564	2/24/97	Memo from Tim Callahan to Mike Casey re INFED Price Strategy	Relevance Hearsay FRE 403 <i>see</i> Track 1 <u>in</u> <u>limine</u> motion	Track 1 Defendants
962	FJ-MDL 005687-89	3/30/95	Memo to Paul Kersten from David Klaum re March 1995 Monthly Report	Relevance Hearsay FRE 403 <i>see</i> Track 1 <u>in</u> <u>limine</u> motion	Track 1 Defendants

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
963		4/14/03	Complaint for Injunctive Relief, Damages and Other Relief, <i>Dey, L.P. v. First DataBank, Inc.</i> , et al, No. 26-21019, (Sup. Ct. Napa County, CA.)	Relevance Hearsay FRE 403 <i>see</i> Track 1 <u>in</u> <u>limine</u> motion	Track 1 Defendants
964	IAWP00852 8-29	2/21/97	Memo from John Frande and Keith Bridges re Reimbursement on Immunex products for AOR analysis	Relevance Hearsay FRE 403 <i>see</i> Track 1 <u>in</u> <u>limine</u> motion	Track 1 Defendants
965	IAWP01296 0-61		Health Care Policy Fast Facts What Happens When We Announce A Price Change For One of Our Products	Relevance Hearsay FRE 403 <i>see</i> Track 1 <u>in</u> <u>limine</u> motion	Track 1 Defendants
966	ABAWP 008988-93	11/92	Reimbursement Alert	Relevance Hearsay FRE 403 <i>see</i> Track 1 <u>in</u> <u>limine</u> motion	Track 1 Defendants
967	ABAWP 012058-67	4/96	Business to Business A quarterly newsletter from Centeon's Corporate Accounts and Sales Operation	Relevance Hearsay FRE 403 <i>see</i> Track 1 <u>in</u> <u>limine</u> motion	Track 1 Defendants
968		10/2/06	Addendum Attachment A: Damages Summary and Backup – Declaration of Raymond S. Hartman: AWP Litigation Addendum to Liability and Calculation of Damages	Daubert Relevance Hearsay	Track 1 Defendants
969		10/2/06	Attachment E – Declaration of Raymond S. Hartman: AWP Litigation In Support of Liability and Calculation of Damages	Daubert Relevance Hearsay	Track 1 Defendants
970		10/2/06	Attachment G: Calculation of Spreads – Declaration of Raymond S. Hartman: AWP Litigation In Support of Liability and Calculation of Damages	Daubert Relevance Hearsay	Track 1 Defendants

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
971		10/2/06	Attachment H – Declaration of Raymond S. Hartman: AWP Litigation In Support of Liability and Calculation of Damages	Daubert Relevance Hearsay	Track 1 Defendants
972		10/2/06	Attachment I – Declaration of Raymond S. Hartman: AWP Litigation In Support of Liability and Calculation of Damages	Daubert Relevance Hearsay	Track 1 Defendants
973		10/2/06	Attachment J: Damage Summary and Backup – Declaration of Raymond S. Hartman: AWP Litigation In Support of Liability and Calculation of Damages	Daubert Relevance Hearsay	Track 1 Defendants
974		10/2/06	Attachment L: Additional Spread and Damages Calculation Notes and Assumptions For the October 2, 2006 Revisions – Declaration of Raymond S. Hartman: AWP Litigation In Support of Liability and Calculation of Damages	Daubert Relevance Hearsay	Track 1 Defendants
975	BAX MDL 0012778	6/11/96	Memo from Hyle A. Bush to Pete O'Malley re: AWP/WAC	Relevance Hearsay FRE 403 <i>see</i> Track 1 <u>in</u> <u>limine</u> motion	Track 1 Defendants
976	MDL- OBI0006082 3-58		Presentation: 1999 Rebate Recommendations	No objection	
977	MDL- OBI0000100 1-2	3/23/97	E-mail from Cathy Dooley to Christine McConnell re: Medicare Drug Payment	No objection	
978	MDL- OBI0000283 7	1/6/00	Memo from Elaine Kling re: “Urgent – Price Change Notification”	No objection	
979	MDL- OBI0006102 5-6	2/19/97	Memo from C. Dooley to S. Welden re: Medicare AWP Drug Reimbursement Proposal	No objection	

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
980		7/27/04	Responses of Schering-Plough Corporation to Plaintiffs' Interrogatories to the Fast Track Defendants	No objection	
981	RRPTOWJ		Centcor, Inc. Remicade Sales Rotation at RA Launch Remicade v. Enbrel - Remicade Masters Sales Aid Site of Care/Reimbursement Issues [DVD]	Relevance Hearsay Not properly authenticated/ lacks proper foundation	J&J
982		8/5/02	Presentation – "Procrit Contracting: Modeling Provider Economics"	No objection	
982A ¹	AZ0554945-60	3/26/03	AstraZeneca Contracting - Steven Pitts, Contracting Director – Phoenix Team meeting	Late disclosure	AstraZeneca
982B	AZ0463307	4/9/03	Email from John Freeberry to David Brennan re: Current Pricing Issues	Late disclosure	AstraZeneca
982C	AZ0048992-9023	1/15/91	1991 Zoladex Promotional Plan by J. R. Hildreth & C.M. Cook	Late disclosure	AstraZeneca
982D	AZ0008783-84	6/21/94	Internal Memorandum from Michael Tilton re: Zoladex	Late disclosure	AstraZeneca
982E	AZ0037020-21		Draft Advertisement for Zoladex	Late disclosure	AstraZeneca
982F	AZ008092-119	00/00/92	Medical/Marketing Operating Plan 1992	Late disclosure	AstraZeneca
982G	AZ0048961-91	1994	Zoladex Prostate Cancer 1994 Operational Plan	Late disclosure	AstraZeneca
982H	AZ0009978-91	1995	Zoladex Prostate Cancer 1995 Operational Plan	Late disclosure	AstraZeneca
982I	AZ0004273-84	1997	Advanced Prostate Cancer 1997 Operational Plan for Zoladex 3.6mg and 10.8mg and Casodex	Late disclosure Relevance as to Casodex	AstraZeneca

¹ On October 9, 2006, Plaintiffs' filed "amended disclosures" including Exhibits 983-1008. Track 1 Defendants and Plaintiffs have conferred regarding the overlap in exhibit numbers caused by these additional exhibits and Plaintiffs have agreed to re-number the exhibits 982A-982Y.

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
982J	AZ0043795-806	9/16/97	Draft Zoladex Gyn/Breast Cancer 1997 Operational Plan	Late disclosure	AstraZeneca
982K	AZ0033814-40	10/1/97	1998 Operational Plan – Casodex & Zoladex – October 1, 1997	Late disclosure Relevance as to Casodex	AstraZeneca
982L	AZ0001598-603	1998	Prostate Cancer 1998 Operational Plan for Casodex & Zoladex with Handwritten Notes	Late disclosure Relevance as to Casodex	AstraZeneca
982M	AZ0427138-783	1999	1999 Operational Plan for The Prostate Cancer Portfolio – Casodex & Zoladex	Late disclosure Relevance as to Casodex	AstraZeneca
982N	AZ0432467-80	4/29/02	Email from Connie McDonough to Kathryn Jones re: Zoladex 2003 Product Strategic Plan	Late disclosure	AstraZeneca
982O	AZ0008130-50	1992-94	Zoladex Medical/Marketing Operational Plan	Late disclosure	AstraZeneca
982P	AZ0008087-91	1994	Zoladex Medical Marketing Operational Plan	Late disclosure	AstraZeneca
982Q	AZ0008069-86	1995	Pharma Deliverables Report – Zoladex Medical Marketing Operational Plan	Late disclosure	AstraZeneca
982R	AZ0024003-10	8/16/95	Zoladex 3.6mg and 10.8mg Prostate Cancer 1996 Operational Plan – Draft #1	Late disclosure	AstraZeneca
982S	AZ0389025		Call Notes from AZ Sales Representative Charels Dadonna	Late disclosure	AstraZeneca
982T	AZ0385646	6/25/00	Call Notes from Dana Nevil, AZ Sales Representative	Late disclosure	AstraZeneca
982U	AZ0069688-701	5/1/96	Zeneca Pharmaceuticals Agreement – Urology Groups	Late disclosure	AstraZeneca
982V	PXL00955-67	1/13/99	Letter from Fred Roberts to Marci Calli attaching an 1998-99 executed contract between Parexel & AstraZeneca	Late disclosure	AstraZeneca

Ex.	Prod. No.	Date	Description	Objections	Defendant(s) Objecting
982W	PXL00036-49		Memorandum to Keith Patterson & Cyndee Davies from Sandy Robinson attaching 1994 partially executed contract between Parexel & AstraZeneca	Late disclosure	AstraZeneca
982X	AZ0036327		Letter to Keith Patterson from Sean Coakley	Late disclosure	AstraZeneca
982Y	AZ0096323		"An Evening With Ray Painer, M.D."	Late disclosure	AstraZeneca

Respectfully submitted,

THE FOLLOWING TRACK 1 DEFENDANTS

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Dated: October 17, 2006

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was delivered on October 17, 2006 to counsel for plaintiffs and to all counsel of record by electronic service pursuant to Paragraph 11 of Case Management Order No. 2, via LexisNexis File & Serve.

By: /s/ Katherine B. Schmeckpeper
Katherine B. Schmeckpeper